

2017 DRAFT ANNUAL ACTION PLAN

City of Milwaukee, Wisconsin

To be submitted to the
U.S. Department of Housing & Urban Development
By the
Community Development Grants Administration
City Hall – 200 East Wells Street; Room 606
Milwaukee, Wisconsin
Steven L. Mahan, Director

Funds Provided by the U.S. Department of Housing & Urban Development

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Community Development Block Grant program was established by Congress in 1974 with the passage of the Housing and Community Development Act. This program provides funds to municipalities and other units of government around the country to develop viable urban communities. This is accomplished by providing affordable, decent housing, a suitable living environment and by expanding economic opportunities principally for low and moderate income persons. Local units of government develop their own programs and funding priorities, however all activities must be consistent with one or more of the following HUD national objectives:

- Principally benefits low/moderate income persons
- Prevents or eliminates slum or blight
- Addresses an urgent need or problem in the community (e.g., natural disaster)

As a Participating Jurisdiction (PJ) and entitlement community, the City of Milwaukee-Community Development Grants Administration (CDGA), receives annual funding allocations from the Federal government to fund activities to address these National Objectives. As a recipient of these funds, the City of Milwaukee is required to submit to HUD every five years, a Consolidated Plan and Strategy that defines the direction the City will take in utilizing these Federal funds to address the national objectives in a manner that will produce the greatest measurable impact on our community.

For the most part the Consolidated Plan is focused on how to best spend Federal HUD dollars. There is little discussion on the need for quality schools, government expenditures for human services or on the role of personal responsibility for life decisions, which impact economic viability. While those are all key issues, they are not within the scope of the Consolidated Plan for the City of Milwaukee's use of Federal funds. While the Consolidated Plan does not directly address these issues as strictly defined, many of the programs funded by the Community Development Grants Administration, (CDGA) have an impact on these concerns and more importantly, bring value to Milwaukee's diverse neighborhoods. The City of Milwaukee, Community Development Grants Administration will continue to strive to address the needs of Milwaukee's residents, while promoting programs and activities that will provide the greatest benefit for our community.

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Milwaukee has presumed the level of funding of each program based on previous annual funding levels. Because these programs are subject to potential changes due to national funding decisions, the projections and planned activities are subject to change based on the availability of funding. The strategies and recommendations outlined in the document attempt to balance the needs and priorities of our community and as identified in the data analysis, with the availability of funds.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Community Development Grants Administration has defined a Housing and Community Development 5-Year Strategy which focuses on creating viable neighborhoods and providing decent housing and economic opportunity for <u>all</u> community residents. This community vision recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and social service providers. These priorities represent a comprehensive approach to neighborhood vitality, housing availability and affordability for all residents and adding value to the community.

To achieve these goals, CDGA will continue planned aggressive blight elimination efforts, support active citizen participation in monitoring problem properties and organizing efforts to improve quality of life issues and encourage the economic integration and revitalization of neighborhoods. Other priorities include integrating crime prevention into a variety of city services and capital improvements, expanding the city's aggressive efforts to combat lead hazards and continuing to support City efforts to eliminate graffiti.

The City's <u>Anti-Poverty Strategy</u> emphasizes jobs and job creation. City departments have utilized a variety of tools to work cooperatively with the non-profit sector and the business community to leverage employment and economic activity in targeted areas of the city and to spark broader policy and programmatic reform to focus on jobs

The City's <u>Economic and Community Development Strategy</u> compliments its Anti-Poverty strategy by emphasizing the interrelationships and the need for the expansion of opportunities in the areas of education, employment, economic development and housing. In terms of targeting resources, Milwaukee continues its commitment to cluster developments and large impact developments. In this vein, there is a growing sense that public and private sector funding should be focused more on tangible outcomes leading to neighborhood revitalization and the creation of jobs, income and wealth. This model of comprehensive planning is embraced by the residents of the target areas as the emphasis is focused on housing improvement, job creation and income enhancement.

The City of Milwaukee's <u>Housing Strategy</u> includes expanded homeownership opportunities and access to affordable housing for all residents, the elimination of blighted structures, the sale and redevelopment of vacant lots, housing rehabilitation and new housing construction for sale to owner-occupants and affordable rental housing for large families, persons with special needs and the elderly. The City also proposes to repair owner-occupied structures and substantially rehabilitate units for eventual homeownership.

Additional Priorities

Other priorities include expanding efforts to assist public housing and Section 8 residents move to private market unsubsidized housing, provide better training, advocacy and mediation services for landlords and tenants and increase the number of rent-assisted housing units and their geographic distribution throughout the metropolitan area and Milwaukee County. The City's objectives to address these issues include placing households in either Section 8 or public housing units as turnover occurs and substantially rehabilitate rental units through the Rent Rehabilitation program.

Persons with special needs as well as the disabled and homeless are an important concern for the City as they strive to bring value to neighborhoods. The <u>Milwaukee Continuum of Care 10 Plan to End Homelessness</u>, details the strategies, goals and action steps to be undertaken and priority needs and allocation priorities as determined by the Milwaukee Continuum of Care (CoC) Planning group. Some of the specific goals of this group include, coordinating the expansion of permanent housing and supportive services options, increasing access to permanent housing and enhancing current data and information systems.

Additionally, the City places an emphasis on addressing the needs of the mentally ill and veterans, youth issues such as dropout rates, recreation, educational programs and employment and overall unemployment issues. Housing and supportive services for persons with Aids and other disabilities are another priority for the City of Milwaukee as well as continuing to monitor the impact of the Wisconsin Works (W-2) programs for Milwaukee's residents.

Lead-based paint hazards and their abatement continue to be a high priority for the City of Milwaukee. To that end, the following strategies are being utilized including: continuous evaluation of lead abatement methods, continuation of a program of grants/loans to assist homeowners and landlords in removing lead hazards, continuing collaborative efforts with other housing programs to identify lead abatement and lead hazard reduction into total housing rehabilitation, expanding education and training for homeowners, landlords and tenants regarding lead poisoning prevention and securing city, state and federal funding to finance lead hazard reduction activities.

The City's <u>Public Housing Improvement Strategy</u>, formulated in conjunction with the Consolidated Plan, notes the following strategies for its residents including: efforts to provide opportunities for resident participation through economic development programs, home ownership programs and supportive services offered through drug elimination grants and economic development and supportive services

Annual Action Plan

(ED/SS) grants at all its public housing developments. Residents are also directly involved in the evaluation of program outcomes and in the determination of the level of satisfaction with facilities and services offered by the Housing Authority. Other initiatives include the Housing Authority's commitment to expand their efforts to assist public housing and Section 8 residents to move to private market unsubsidized housing and the portability of residents who wish to relocate to other communities outside the city.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

As required by HUD, a Consolidated Annual Performance and Evaluation Report (CAPER) is submitted to HUD following the end of each program year which ends on December 31st. The CAPER provides an actual account of activities, accomplishments and expenditures, which occurred during the previous program year.

In 2015, approximately \$11.3 million in Community Development Block Grant (CDBG) and HOME entitlement dollars was allocated for direct housing and housing-related activities, including owner-occupied housing rehabilitation, acquire/rehab/sell, vacant and blighted homes, new home construction, rental rehabilitation, lead abatement and other categories. This resulted in the completion of direct housing and/or rehab activities. Other housing-related activities resulted in the following: homebuyer counseling programs assisted *first-time* low-income homebuyers in closing home mortgage loans, property units received graffiti abatement, landlords received training on effective property management and various types of tenant assistance, including tenant training, were provided to community residents.

In 2015, CDBG funds were allocated to anti-crime community development and quality of life related activities including: community organizing and crime prevention, employment services, youth programming, health services, safe havens, driver's license recovery, infant mortality initiatives and community prosecution activities.

The 2015 accomplishments related to anti-crime activities involved residents in: resident meetings and neighborhood improvement efforts such as cleanups, establishing new block clubs, and identifying hot spots, (drug houses or nuisance properties) which were referred to the appropriate authorities for action through the Community Prosecution program. In addition, thousands of youth benefited from a variety of youth employment, educational and recreation initiatives. These varied organizing efforts correlate with the five-year strategy of the Consolidated Plan of increasing resident participation to improve the overall quality of life for residents.

CDBG-funded **Job Training and Placement** and **Job Placement** activities assisted low income persons in obtaining employment and the **Special Economic Development** initiatives led to the creation of new

jobs. The Milwaukee Economic Development Corporation Revolving Loan fund continued servicing existing loans for continued job creation.

In 2015, CDBG and ESG funding were allocated for mandated and essential services such as homeless shelters and domestic violence prevention programs. Funds were also allocated to city-wide services including: fair housing, graffiti abatement and landlord/tenant programs. In addition, community-based organizations received technical assistance to help strengthen their administrative capabilities and promote efficient services to the residents they serve. Enforcement services were provided to clients to resolve housing and lending discrimination complaints.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Lead Agency: The agency responsible for oversight and monitoring of these Federal funds and ensuring that these activities are implemented is the Community Development Grants Administration. The oversight body for CDGA is the City of Milwaukee Community and Economic Development Committee(CED) of the Milwaukee Common Council. All actions taken by the Committee are ratified by the Milwaukee Common Council and the Mayor. CDGA annually solicits and evaluates applications from all interested parties through an open and competitive Request For Proposal (RFP) process. The funding categories for the RFP process receive input from the community at large and are finalized by the CED Committee and Mayor. Recommendations for annual funding are made to the Community and Economic Development Committee for approval with final ratification by the Milwaukee Common Council and Mayor.

In accordance with the regulations of the U.S. Department of Housing and Urban Development and in an effort to ensure adequate and accessible citizen participation, the City of Milwaukee adopted a Citizen Participation Plan, which was reviewed and approved by the Common Council of the City of Milwaukee on April 23, 1991. The plan outlines the procedures and processes used by the City to solicit citizen input and has since been updated and revised. The document was subsequently submitted and approved by HUD.

The City's Citizen Participation Plan requires public hearings to obtain citizen input on funding proposals and inquiries at all stages of the community development program, including the Consolidated Plan and Annual Funding Allocation Plan(FAP) and review of proposed activities and program performance. The FAP is meant to define the City's community development needs and funding priorities as it relates to the use of Federal funds. Essentially, the FAP is the basis for the Request for Proposals process. The FAP is reviewed annually through public hearings and amended where appropriate, as needs within the community change. Broad-based citizen and community input by stakeholders is strongly encouraged and solicited. Over the years, the City of Milwaukee has used its Federal entitlement funds to creatively respond to community needs and to enable neighborhood residents, businesses and other community stakeholders to achieve the highest possible quality of life. Community-based organizations are essential

to these goals for responding to community needs and for strengthening the social and economic infrastructure of Milwaukee's neighborhoods and their efforts are also coordinated with City agencies which have the same mission. Relative to the allocation of funds, the City of Milwaukee places the highest priority on those programs which directly serve low and moderate income persons(defined as those with incomes of 80% or less of Milwaukee's median income). Priority is also given to those projects which serve residents of the Neighborhood Revitalization Strategy Areas(NRSAs), of which at least 70% of all residents are considered low income.

City's Notification Requirement Regarding Draft Plan Availability

A notification will be advertised in a minimum of two local newspapers of general circulation to inform the public that a draft Consolidated Plan, or draft Annual Action Plan is available to review and subject to public comment. The notification will describe the contents and purpose of the particular plan. The notice will also be posted on the City's website (www.milwaukee.gov/cdbg).

The public notice will state that copies of the particular Plan will be available for review on the City's website, City libraries, the City's Legislative Bureau and the offices of CDGA. Physical copies will also be available upon request. The City will make the Plan(s) public, and upon request in a format accessible to persons with disabilities. The City will provide citizens a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by this Citizen Participation Plan. The City will consider any comments or views of citizens received in writing, or orally, at any of the public hearings, or during the 30-day public review and will address those comments in the Plan. In preparation of the final Consolidated Plan, or Annual Action Plan, the City will include any written or oral comments on the plans in the final submission to HUD.

Performance Reports

Further citizen involvement is affected by the provision of Accomplishment Reports that identify the annual goals of each program funded and the status of the activities at each quarterly reporting period. This allows concerned citizens and other stakeholders the opportunity to determine if program operators working in their planning areas are delivering the services as funded.

As required by HUD, a Consolidated Annual Performance and Evaluation Report (CAPER) will be submitted to HUD by March 31st following the end of each program year which ends on December 31st. The CAPER provides an actual account of activities, accomplishments and expenditures, which occurred during the previous program year.

The City will publish a notice in at least two local newspapers regarding the availability of the CAPER, which will begin the 30-day review and comment period. The notice and the draft CAPER will also be

made available to the public via the City's website, City libraries, Legislative Reference Bureau, CDGA offices and to interested persons who request a copy of the report.

Upon completion of the CAPER and prior to its submission to HUD, the City will make the report available to the general public for a (30) day review and comment period. Any comments received from the general public will be included in Final CAPER submitted to HUD.

The Community & Economic Development Committee will hold a hearing on the CAPER. Each public hearing notice will include the availability of an interpreter if requested by non-English speaking or hearing-impaired persons that expected to participate at the hearing.

Citizen Participation

Citizen Participation on 2017 Annual Action Plan

The Community Development Grants Administration sponsored several public hearings to solicit the input of stakeholders on funding priorities. It should be noted that the planning and implementation process is an ongoing, funded activity conducted by each of the coordinating agencies. Monthly reports are submitted to CDGA detailing citizen and stakeholder planning and action on issues relating to identified long term outcomes.

In addition, bi-annual performance measurement outcome reports and supporting data are submitted by each coordinating agency. For the 2017 program year, the following public hearings were held to solicit citizen input on the <u>Year 2017 Funding Allocation Plan</u>, which outlines the range of activities that may be undertaken, the amount of federal funds available and any significant program changes. The public hearings were conducted by members of the Community and Economic Development Committee, the official oversight body for Federal grant funds.

Public Hearing Dates on 2017 Funding Allocation Plan

- 1) Monday, July 11, 2016, St. Ann Center for Intergenerational Care; 2450 W. North Ave., Milwaukee, WI. 6:00-8:00 pm
- 2) Tuesday, July 12, 2016, Mitchell Park Conservatory; 524 S. Layton Blvd., Milwaukee, WI. 6:00-8:00 pm
- 3) Wednesday, July 13, 2016; City Hall, 200 East Wells Street, Room 301-B, 1:30 pm

CDGA provided copies of the <u>2017 Funding Allocation Plan</u> to interested citizens and other stakeholders to solicit community/resident feedback. Citizens were able to comment on the Plan from *June 24, 2016 through July 25, 2016*. CDGA advertised the public hearings through newspapers, mailings, e-mail, telephone calls, City website and word of mouth. The Common Council City Clerk's Office advertised and

posted public notices for the hearings. In addition, the City included in all advertisements that it would accommodate the needs of disabled individuals through sign language interpreters or other auxiliary aids.

All public hearings were held at times and locations convenient to citizens, potential and actual beneficiaries, community-based agencies and other interested parties, with accommodations provided for persons with disabilities. These public hearings were held in the evenings and at locations in the community that are accessible for persons with disabilities. The public hearings were well publicized through newspaper notices, including Spanish language papers. In addition, two of the meetings were held at agencies that are located in neighborhoods with a majority of African American, Hispanic and non-English speaking persons.

The Year 2017 activities and service providers were approved by the Community and Economic Development Committee (special meeting) on November 1, 2016, and approved by the Milwaukee Common Council on November 1, 2016 and ratified by the Mayor.

Copies of the <u>2017 Annual Action Plan</u> are on file at the CDGA offices, the City's website, the Milwaukee Public Library system and the City's Legislative Reference Bureau. In addition, the plan was made available to all currently funded community-based organizations, interested parties on CDGA's mailing list, all neighborhood strategic planning agencies, public officials, City departments and others who requested a copy of the document.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

<u>Summary of Citizen comments on the Consolidated Annual Action Plan:</u> As stated, CDGA held several public hearings on the Plan. Several citizens and representatives from non-profit agencies spoke regarding the following: youth services funding, housing, community organizing, and anti-crime initiatives.

6. Summary of comments or views not accepted and the reasons for not accepting them

There were no comments that were not accepted on the Plan.

7. Summary

It should be noted that CDGA strives for increased citizen input and comments in connection with federally funded activities. The City has consistently prepared "drafts" of the Annual Funding Allocation Plan, the Consolidated Annual Performance and Evaluation Plan (CAPER) and previous Consolidated Plans which cover the City's Community Development Program. Additionally the Community

Development Grants Administration held public hearings to obtain citizen input on the Year 2016 Funding Allocation Plan. Copies of the CAPER, Annual Action Plan and Consolidated Strategy and Plan are on file with the Milwaukee Public Library System, the CDGA offices and the Legislative Reference Bureau.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

| Agency Role | | Name | | Department/Agency | |
|---------------------|-----------|------|---|-------------------|--|
| | | | | | |
| CDBG Administrator | MILWAUKEE | | Community Development Grants Administration | | |
| HOPWA Administrator | MILWAUKEE | | Community Development Grants Administration | | |
| HOME Administrator | MILWAUKEE | | Community Development Grants Administration | | |
| ESG Administrator | MILWAUKEE | | Community Development Grants Administration | | |

Table 1 – Responsible Agencies

Narrative (optional)

Lead Agency: The agency responsible for oversight and monitoring of these Federal funds and ensuring that these activities are implemented is the Community Development Grants Administration. The oversight body for CDGA is the City of Milwaukee Community and Economic Development Committee of the Milwaukee Common Council. All actions taken by the Committee are ratified by the Milwaukee Common Council and the Mayor. The CDGA solicits and evaluates applications from all interested parties through the open and competitive Request For Proposal (RFP) process. Recommendations for funding are made to the Community and Economic Development Committee for approval with final ratification by the Milwaukee Common Council and Mayor.

Consolidated Plan Public Contact Information

Steven L. Mahan, Director, Community Development Grants Administration, City of Milwaukee, Wisconsin

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Milwaukee conducts numerous activities in coordination with various units of government including Milwaukee County, the State of Wisconsin and the jurisdictions of West Allis and Cudahy. Activities include: shelter, joint cooperation on a County-wide Analysis of Impediments study for the entire Milwaukee County region and affordable housing projects.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

Public Private Partnerships

- 1. Zilber Initiative (\$50 million, 10-year Neighborhood Initiative to revitalize poverty-stricken Milwaukee neighborhoods)
- 2. City of Milwaukee/Milwaukee County Continuum of Care(CoC)
- 3. Mayor Tom Barrett and the City of Milwaukee Common Council Strong Neighborhoods Plan (\$11 million per year 2014-2016 to diminished the effects of mortgage and property tax foreclosure)
- 4. Environmental sustainability City & community partners on HomeGrown
- 5. Me2 Program(Energy Efficiency Program to help homeowners and businesses make their properties more energy efficient)
- 6. Local Initiatives Support Corporation (LISC) [\$25 million over the next five years] non-profit that focuses on community development, leveraging private capital and increasing economic activity
- 7. Greater Milwaukee Foundation (Healthy Neighborhoods Initiative)
- 8. Housing partnerships Habitat For Humanity, Housing Authority City of Milwaukee (HACM)
- 9. City partnerships Southeastern Wisconsin Regional Planning Commission (SEWRPC)
- 10. Milwaukee 7 (regional, cooperative economic development consortium)
- 11. Lead abatement trainees learn effective lead-safe work practices while addressing lead hazard issues affecting City residents
- 12. Collaborations with State agencies such as: WHEDA (Low Income Housing Tax Credits); City tax levy for Housing Trust Fund Projects which is leveraged with HOME funds, bank financing and private developer funds/assets
- 13. Collaborations with Milwaukee County government on Fair Housing/Analysis to Impediments Study
- 14. City's Housing Trust Fund collaborates with numerous housing providers
- 15. Community Relations-Social Development Commission (SDC), Milwaukee County's designated Community Action Agency (CAA) whose mission is "Empowering Milwaukee County residents with the resources to move beyond poverty"

- 16. MAWIB (Milwaukee Area Workforce Investment Board, Inc.) whose mission is to build a workforce development system
- 17. The MAWFA (Milwaukee Area Workforce Funding Alliance) employer-driven consortium of private and public funders of workforce development dedicated to increasing the Milwaukee region's employment environment

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The mission of the City of Milwaukee and Milwaukee County Continuum of Care(CoC) is to organize people and resources to end homelessness in Milwaukee. The City of Milwaukee is the lead support agency providing staff to the various committees and workgroups that constitute the CoC. The CoC is comprised of several volunteer committees and networking/task force groups which have various roles and responsibilities to fulfill the mission of the CoC. In addition, the CoC has established numerous partnerships with local and regional entities with expertise in developing, operating and maintaining permanent housing for homeless persons. Decisions are made by the CoC on the allocation of ESG funds, performance standards and outcomes, and policies and procedures for the administration of HMIS.

The State of Wisconsin Department of Administration-Division of Housing, serves as the Homeless Management Information System(HMIS) administrator, responsible for the maintenance, oversight, security and information contained therein. As the HMIS Lead Agency for the CoC, the Department of Administration assesses current reporting needs, trains agency system users, leads the *Point-In-Time* process and provides required HUD reports.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The mission of the City of Milwaukee and Milwaukee County Continuum of Care(CoC) is to organize people and resources to end homelessness in Milwaukee. The City of Milwaukee is the lead support agency providing staff to the various committees and workgroups that constitute the CoC. The CoC is comprised of several volunteer committees and networking/task force groups which have various roles and responsibilities to fulfill the mission of the CoC. In addition, the CoC has established numerous partnerships with local and regional entities with expertise in developing, operating and maintaining permanent housing for homeless persons. Decisions are made by the CoC on the allocation of ESG funds, performance standards and outcomes, and policies and procedures for the administration of HMIS.

The State of Wisconsin Department of Administration-Division of Housing, serves as the Homeless Management Information System(HMIS) administrator, responsible for the maintenance, oversight, security and information contained therein. As the HMIS Lead Agency for the CoC, the Department of Administration assesses current reporting needs, trains agency system users, leads the *Point-In-Time* process and provides required HUD reports.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

| 1 | Agency/Group/Organization | THE WISCONSIN WOMEN'S BUSINESS INITIATIVE CORPORATION |
|---|---|--|
| | Agency/Group/Organization Type | Economic Development |
| | What section of the Plan was addressed by Consultation? | Economic Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The 2017 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. |
| 2 | Agency/Group/Organization | MILWAUKEE CAREERS COOPERATIVE |
| | Agency/Group/Organization Type | Services-Employment |
| | What section of the Plan was addressed by Consultation? | Employment Services |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The 2017 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. |
| 3 | Agency/Group/Organization | Independence First |
| | Agency/Group/Organization Type | Services-Persons with Disabilities |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs |

| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The 2017 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. |
|---|---|--|
| 4 | Agency/Group/Organization | SAFE AND SOUND, INC |
| | Agency/Group/Organization Type | Services-Children |
| | What section of the Plan was addressed by Consultation? | Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The 2017 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. |
| 5 | Agency/Group/Organization | Metropolitan Milwaukee Fair Housing Council |
| | Agency/Group/Organization Type | Service-Fair Housing |
| | What section of the Plan was addressed by Consultation? | Fair Housing |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The 2017 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. |
| 6 | Agency/Group/Organization | WISCONSIN REGIONAL TRAINING PARTNERSHIP |
| | Agency/Group/Organization Type | Services-Employment |

| | What section of the Plan was addressed by Consultation? | Anti-poverty Strategy |
|---|---|--|
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The 2017 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. |
| 7 | Agency/Group/Organization | AIDS RESOURCE CENTER OF WISCONSIN |
| | Agency/Group/Organization Type | Services-Persons with HIV/AIDS |
| | What section of the Plan was addressed by Consultation? | HOPWA Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The 2017 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. |
| 8 | Agency/Group/Organization | COMMUNITY ADVOCATES |
| | Agency/Group/Organization Type | Services-homeless |
| | What section of the Plan was addressed by Consultation? | Homelessness Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The 2017 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. |

| 9 | Agency/Group/Organization | HOUSING RESOURCES |
|----|---|--|
| | Agency/Group/Organization Type | Housing |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The 2017 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. |
| 10 | Agency/Group/Organization | Community First, Inc. |
| | Agency/Group/Organization Type | Housing |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The 2017 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. |

Identify any Agency Types not consulted and provide rationale for not consulting

Not Applicable. Input was received from numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.

Other local/regional/state/federal planning efforts considered when preparing the Plan

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|-------------------|--------------------|---|
| | City of Milwaukee- | The City of Milwaukee is the lead agency for the Continuum of Care. All planning and expected |
| Continuum of Care | CDGA | outcomes are consistent with CDGA's efforts of achieving the national objective of ending |
| | CDGA | homelessness. |

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City's Citizen Participation Plan requires public hearings to obtain citizen input on funding proposals and inquiries at all stages of the community development program, including the Consolidated Plan and Annual Funding Allocation Plan (FAP) and review of proposed activities and program performance. The FAP is meant to define the City's community development needs and funding priorities as it relates to the use of Federal funds. Essentially, the FAP is the basis for the Request for Proposals process. The FAP is reviewed annually through public hearings and amended where appropriate, as needs within the community change. Broad-based citizen and community input by stakeholders is strongly encouraged and solicited. Over the years, the City of Milwaukee has used its Federal entitlement funds to creatively respond to community needs and to enable neighborhood residents, businesses and other community stakeholders to achieve the highest possible quality of life. Community-based organizations are essential to these goals for responding to community needs and for strengthening the social and economic infrastructure of Milwaukee's neighborhoods and their efforts are also coordinated with City agencies which have the same mission.

In 2016, CDGA provided copies of the <u>2017 Funding Allocation Plan</u> to interested citizens and other stakeholders to solicit community/resident feedback. Citizens were able to comment on the Plan from *June 24, 2016 through July 25, 2016*. CDGA advertised the public hearings through newspapers, mailings, e-mail, telephone calls, City website and word of mouth. The Common Council City Clerk's Office advertised and posted public notices for the hearings.

Although, the City already satisfied the requirement of citizen participation, due to a substantial increase in additional federal funds (outlined below), the City of Milwaukee looks to solicit community/resident feedback on the revised 2017 Annual Action Plan.

The U.S. Department of HUD – Office of Community Planning and Development issued (CPD) Notice 16-18 that provides a waiver to "any grantee with a program year start date prior to, or up to 60 days after, the department's announcement of the FY 2017 formula program allocations."

The City of Milwaukee utilized the waiver granted in CPD Notice 16-18 to allow 14 additional days for citizen input on the revised 2017 Annual Action Plan.

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Citizen Participation Outreach

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|---|--|--|---|---------------------|
| 1 | Public Meeting | Minorities Non-English Speaking - Specify other language: Spanish, Hmong Persons with disabilities Non- targeted/broad community Residents of Public and Assisted Housing | Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives. | Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives. | Not applicable. All comments were accepted and considered in developing the Year 2017 Annual Action Plan. | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|---|--|--|---|---------------------|
| 2 | Public Hearing | Minorities Non-English Speaking - Specify other language: Spanish, Hmong Persons with disabilities Non- targeted/broad community Residents of Public and Assisted Housing | Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives. | Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives. | Not applicable. All comments were accepted and considered in developing the Year 2017 Annual Action Plan. | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|---|--|--|---|---------------------|
| 3 | Newspaper Ad | Minorities Non-English Speaking - Specify other language: Spanish, Hmong Persons with disabilities Non- targeted/broad community Residents of Public and Assisted Housing | Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives. | Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives. | Not applicable. All comments were accepted and considered in developing the Year 2017 Annual Action Plan. | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|---|--|--|---|---------------------|
| 4 | City Website | Minorities Non-English Speaking - Specify other language: Spanish, Hmong Persons with disabilities Non- targeted/broad community Residents of Public and Assisted Housing | Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives. | Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives. | Not applicable. All comments were accepted and considered in developing the Year 2017 Annual Action Plan. | |

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Many activities identified in the Consolidated Plan are under the direct control and supported by the following Federal entitlement funds which are administered by the Community Development Grants Administration: Community Development Block Grant (CDBG), HOME Investment Partnerships, Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA). Other Federal and State funds will also be used for proposed activities.

CDGA is committed to leveraging funding resources from other types of public and private sources for community development projects funded through CDGA. The projects receiving Emergency Solutions Grant (ESG) funds will utilize CDBG funds and agency private funds and donations to match the use of the ESG funds. Also, in addition to CDBG funds, other State funds and non-governmental funds will be used in conjunction with shelter related activities.

The housing rehabilitation projects will leverage funds from the private sector mostly in the form of funds borrowed from lenders providing construction financing and permanent financing. Low Income Housing Tax Credits directly provide a needed subsidy in low-income rental projects by selling the credits to investors. Matching funding for the HOME program will include Housing Trust Fund projects and other housing activities undertaken by the City of Milwaukee. HOME funds are also sometimes combined with CDBG funds and/or private funds.

Economic development funds will compliment projects from the Department of Justice, Safe Havens which directly impact community security and safety issues.

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Milwaukee has presumed the level of funding of each program based on previous annual funding levels. Because these programs are subject to potential changes due to national funding decisions, the projections and planned activities are subject to change based on the availability of funding. The strategies and recommendations outlined in the document attempt to balance the needs and

Annual Action Plan

priorities of our community and as identified in the data analysis, with the availability of funds.

Anticipated Resources

| Program | Source | Uses of Funds | Expe | cted Amou | nt Available Y | ear 1 | Expected | Narrative Description |
|---------|---------------------|-------------------------------|-----------------------------|--------------------------|--------------------------------|--------------|--|---|
| | of Funds | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | Amount Available Remainder of ConPlan \$ | |
| CDBG | public - federal | Acquisition Admin and | | | | | | This includes Affordable Housing; Graffiti Abatement; Code Enforcement; |
| | | Planning Economic Development | | | | | | Public Services; Planning; Economic Development; Fair Housing; Technical Assistance; Administration of all funded |
| | | Housing Public Improvements | | | | | | programs. Prior year resources of 913,606 are recovered funds from prior year(s) activities. |
| | | Public Services | 14,472,297 | 0 | 0 | 14,472,297 | 23,000,000 | |

| Program | Source | Uses of Funds | Expe | cted Amou | nt Available Yo | ear 1 | Expected | Narrative Description | |
|---------|-------------|------------------|-----------------------------|--------------------------|--------------------------------|--------------|--|--------------------------------------|--|
| | of Funds | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | Amount Available Remainder of ConPlan \$ | | |
| HOME | public - | Acquisition | | | | | | This includes Affordable Housing: | |
| | federal | Homebuyer | | | | | | Owner-Occupied & Rental Rehab & | |
| | | assistance | | | | | | New Construction; (Includes CHDO & | |
| | | Homeowner | | | | | | CHDO Operating Funds. Prior year | |
| | | rehab | | | | | | resources of 2,146,222 are recovered | |
| | | Multifamily | | | | | | funds from prior year(s) activities. | |
| | | rental new | | | | | | | |
| | | construction | | | | | | | |
| | | Multifamily | | | | | | | |
| | | rental rehab | | | | | | | |
| | | New | | | | | | | |
| | | construction for | | | | | | | |
| | | ownership | | | | | | | |
| | | TBRA | 4,326,217 | 0 | 0 | 4,326,217 | 6,800,000 | | |

| Program | Source | Uses of Funds | Expe | cted Amou | nt Available Yo | ear 1 | Expected | Narrative Description |
|---------|-------------|--------------------|-----------------------------|--------------------------|--------------------------------|--------------|--|---------------------------------------|
| | of Funds | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | Amount Available Remainder of ConPlan | |
| | | | | | | | \$ | |
| HOPWA | public - | Permanent | | | | | | This Includes: Housing & supportive |
| | federal | housing in | | | | | | services for persons with HIV/AIDS to |
| | | facilities | | | | | | facilitate housing stability, |
| | | Permanent | | | | | | independence and improve quality of |
| | | housing | | | | | | life. For persons in 4-County Metro |
| | | placement | | | | | | Milwaukee area. |
| | | Short term or | | | | | | |
| | | transitional | | | | | | |
| | | housing facilities | | | | | | |
| | | STRMU | | | | | | |
| | | Supportive | | | | | | |
| | | services | | | | | | |
| | | TBRA | 678,786 | 0 | 0 | 678,786 | 1,086,000 | |

| Program | Source | Uses of Funds | Expe | cted Amou | nt Available Yo | ear 1 | Expected | Narrative Description |
|---------|---------------------|---|-----------------------------|--------------------------|--------------------------------|--------------|--|--|
| | of Funds | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | Amount Available Remainder of ConPlan \$ | |
| ESG | public - federal | Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional | | | | | | This includes: Housing and services for homeless individuals and families; victims of domestic violence and troubled youth; including assistance with obtaining appropriate supportive services, permanent housing, transitional housing, medical and mental health treatment, counseling, supervision, and other services essential for independent living. |
| | | housing | 2,041,570 | 0 | 0 | 2,041,570 | 2,000,000 | |

Table 5 - Expected Resources - Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

<u>HOME Funds</u> – The City of Milwaukee for the past several years has received a HUD waiver. However, when required to match the HOME funds the City will utilize City-owned appraised land/real property, foregone taxes, fees, charges, Housing Trust Fund, City bond financing, eligible City resources under the Strong Neighborhoods Plan, and other eligible affordable housing projects.

| <u>ESG Funds</u> – The City meets the HUD requirement by requiring that funded agencies provide documentation of eligible sources of funds. | [:] matching |
|---|-----------------------|
| | |
| | |
| | |

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not Applicable

Discussion

The City also continues to provide funding and staff to the City of Milwaukee Housing Trust Fund. The Housing Trust Fund has been able to address some of the city's housing needs through gap financing and other means for the last several years. Increasing homeownership, increasing the supply of quality rental housing opportunities and providing housing opportunities for the homeless are three of the trust fund's goals. The City's Strong Neighborhoods Initiative is assisting the City and local nonprofits in more effectively addressing the housing foreclosure crisis and its impacts on our neighborhoods. Neighborhoods of color are disproportionately harmed by the foreclosure crisis. Since 2014 both initiatives have been funded with local tax revenue at approximately \$11.5 million per year.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|---------------|--------------------|---------------|-------------|-------------|--------------------|--------------------|-------------|---------------------------------|
| 1 | Affordable Housing | 2015 | 2019 | Affordable | NRSA AREA | Affordable Housing | CDBG: | Rental units rehabilitated: 5 |
| | | | | Housing | #1 | | \$3,320,850 | Household Housing Unit |
| | | | | | NRSA AREA | | HOPWA: \$0 | Homeowner Housing Added: 12 |
| | | | | | #2 | | HOME: | Household Housing Unit |
| | | | | | City of | | \$3,906,217 | Homeowner Housing |
| | | | | | Milwaukee | | ESG: \$0 | Rehabilitated: 1605 Household |
| | | | | | | | | Housing Unit |
| 2 | Economic | 2015 | 2019 | Non-Housing | NRSA AREA | Economic | CDBG: | Jobs created/retained: 65 Jobs |
| | Development | | | Community | #1 | Development | \$1,176,500 | |
| | | | | Development | NRSA AREA | | HOPWA: \$0 | |
| | | | | | #2 | | HOME: \$0 | |
| | | | | | City of | | ESG: \$0 | |
| | | | | | Milwaukee | | | |
| 4 | Public Services | 2015 | 2019 | Non-Housing | NRSA AREA | Public Services | CDBG: | Public service activities other |
| | | | | Community | #1 | | \$3,997,150 | than Low/Moderate Income |
| | | | | Development | NRSA AREA | | HOPWA: \$0 | Housing Benefit: 1500000 |
| | | | | | #2 | | HOME: \$0 | Persons Assisted |
| | | | | | City of | | ESG: \$0 | |
| | | | | | Milwaukee | | | |

| Sort | Goal Name | Start | End | Category | Geographic | Needs Addressed | Funding | Goal Outcome Indicator |
|-------|-------------------|-------|------|-------------------|------------|-------------------|-------------|---------------------------------|
| Order | | Year | Year | | Area | | | |
| 5 | Planning | 2015 | 2019 | Planning | City of | Planning | CDBG: | Other: 0 Other |
| | | | | | Milwaukee | | \$107,500 | |
| | | | | | | | HOPWA: \$0 | |
| | | | | | | | HOME: \$0 | |
| | | | | | | | ESG: \$0 | |
| 6 | Clearance & | 2015 | 2019 | Clearance and | City of | Clearance and | CDBG: | Brownfield acres remediated: 10 |
| | Demolition | | | Demolition | Milwaukee | Demolition | \$636,297 | Acre |
| | | | | | | | HOPWA: \$0 | Buildings Demolished: 25 |
| | | | | | | | HOME: \$0 | Buildings |
| | | | | | | | ESG: \$0 | |
| 7 | CDBG Non Profit | 2015 | 2019 | Capacity Building | City of | CDBG Non Profit | CDBG: | Other: 50 Other |
| | Organization | | | for CBOs | Milwaukee | Organization | \$75,000 | |
| | Capacity Building | | | | | Capacity Building | HOPWA: \$0 | |
| | | | | | | | HOME: \$0 | |
| | | | | | | | ESG: \$0 | |
| 8 | Administration | 2015 | 2019 | Administration | City of | Administration | CDBG: | Other: 0 Other |
| | | | | | Milwaukee | | \$1,791,500 | |
| | | | | | | | HOPWA: \$0 | |
| | | | | | | | HOME: | |
| | | | | | | | \$420,000 | |
| | | | | | | | ESG: \$0 | |
| 9 | Fair Housing | 2015 | 2019 | Fair Housing | City of | Fair Housing | CDBG: | Other: 150 Other |
| | | | | | Milwaukee | | \$137,500 | |
| | | | | | | | HOPWA: \$0 | |
| | | | | | | | HOME: \$0 | |
| | | | | | | | ESG: \$0 | |
| | | | L | l | | I | 1 | |

| Sort | Goal Name | Start | End | Category | Geographic | Needs Addressed | Funding | Goal Outcome Indicator |
|-------------|-------------------|------------------|------------------|---------------|-----------------|-------------------|-------------|--------------------------------|
| Order 10 | Accessible Rehab | Year 2015 | Year 2019 | Non-Homeless | Area City of | Accessible Rehab | CDBG: | Homeowner Housing |
| 10 | Accessible Kellab | 2013 | 2019 | | Milwaukee | Accessible Kellab | \$40,000 | Rehabilitated: 60 Household |
| | | | | Special Needs | iviliwaukee | | | |
| | | | | | | | HOPWA: \$0 | Housing Unit |
| | | | | | | | HOME: \$0 | |
| | | | | | | | ESG: \$0 | |
| 11 | Code Enforcement | 2015 | 2019 | Code | City of | Code Enforcement | CDBG: | Housing Code |
| | | | | Enforcement | Milwaukee | | \$2,035,000 | Enforcement/Foreclosed |
| | | | | | | | HOPWA: \$0 | Property Care: 5175 Household |
| | | | | | | | HOME: \$0 | Housing Unit |
| | | | | | | | ESG: \$0 | |
| 12 | Shelter/Domestic | 2015 | 2019 | Homeless | City of | Shelter/Domestic | CDBG: | Homeless Person Overnight |
| | Abuse | | | | Milwaukee | Abuse | \$1,155,000 | Shelter: 3675 Persons Assisted |
| | | | | | | | HOPWA: \$0 | |
| | | | | | | | HOME: \$0 | |
| 13 | Vacant/Blighted | 2015 | 2019 | Non-Housing | City of | Vacant/Blighted | CDBG: \$0 | Other: 0 Other |
| | Real Estate | | | Community | Milwaukee | Real Estate | HOPWA: \$0 | |
| | | | | Development | | | HOME: \$0 | |
| | | | | | | | ESG: \$0 | |
| 14 | HOPWA | 2015 | 2019 | HOPWA | 4-County | HOPWA | CDBG: \$0 | HIV/AIDS Housing Operations: |
| | | | | | Metro | | HOPWA: | 108 Household Housing Unit |
| | | | | | Milwaukee | | \$678,786 | |
| | | | | | area | | HOME: \$0 | |
| | | | | | | | ESG: \$0 | |

| Sort | Goal Name | Start | End | Category | Geographic | Needs Addressed | Funding | Goal Outcome Indicator |
|-------|--------------------|-------|------|----------|------------|--------------------|-------------|----------------------------------|
| Order | | Year | Year | | Area | | | |
| 15 | Homeless Services- | 2015 | 2019 | Homeless | City of | Homeless Services- | HOPWA: \$0 | Tenant-based rental assistance / |
| | Emergency | | | | Milwaukee | Emergency | HOME: \$0 | Rapid Rehousing: 2000 |
| | Solutions Grants | | | | | Solutions Grants | ESG: | Households Assisted |
| | | | | | | | \$2,041,570 | Homeless Person Overnight |
| | | | | | | | | Shelter: 6120 Persons Assisted |
| | | | | | | | | Homelessness Prevention: 880 |
| | | | | | | | | Persons Assisted |

Table 6 – Goals Summary

Goal Descriptions

| 1 | Goal Name | Affordable Housing |
|---|---------------------|--|
| | Goal Description | *Rehabilitate distressed properties in the Target Area with a focus on deteriorated, boarded and vacant properties with an emphasis on foreclosures. |
| | | At completion, the properties are code compliant and energy efficient and are marketed to income eligible residents. |
| | | *Construct new homes on vacant city lots (infill) for sale to low/moderate income owner-occupants. |
| | | *Provide loans and technical assistance to owner-occupants of one to four unit residential properties in need of repair and at very low interest. Code violations and energy conservation items are the top priorities of the program. |

| 2 | Goal Name | Economic Development |
|---|---------------------|---|
| | Goal Description | <u>Special Economic Development/Business Assistance</u> – Community-based agencies provide technical assistance to businesses to help spur new job creation and job retention. Assistance includes: business plan development, financial accounting, loan underwriting, legal and tax consulting and contract procurement. |
| | | <u>Revolving Loan Fund Program</u> - Expand economic opportunities by provide loans to businesses to create jobs for low income residents. |
| | | Office of Small Business Development - Assist and protect the interest of emerging and small business concerns. Promote and encourage full and open competition in the City of Milwaukee so emerging businesses may successfully compete in a free market as independent business owners. Establish mentor-protégé relationships between small businesses and those businesses in the mainstream marketplace. |
| 4 | Goal Name | Public Services |
| | Goal Description | |
| 5 | Goal Name | Planning |
| | Goal Description | As Lead agency for the Milwaukee Continuum of Care, this activity includes administration, oversight and management of CoC planning, service coordination and funding processes. This also includes work with the City's Equal Rights Commission. |
| 6 | Goal Name | Clearance & Demolition |
| | Goal Description | Brownfields Redevelopment - Program is geared toward revitalizing properties/sites that are vacant or underutilized and are often suspected to be environmentally contaminated. The program aims to turn blighted sites into economically productive properties and relieve the significant psychological barriers that can inhibit the quality of life within a commercial or residential neighborhood. |
| 7 | Goal Name | CDBG Non Profit Organization Capacity Building |
| | Goal Description | Provide technical assistance to community-based organizations to help strengthen their administrative capabilities, board development and promote efficient services to the residents they serve |

| 8 | Goal Name | Administration | |
|---|--|---|--|
| Goal This includes administration, management, monitoring and oversight of all Federally-funder Community Development Grants Administration. | | This includes administration, management, monitoring and oversight of all Federally-funded programs administered by the Community Development Grants Administration. | |
| 9 | Goal Name | Fair Housing | |
| Description homeowners on discriminatory homeowner's insurance practices, fair housing training sem | | | |
| Fair Housing Enforcement - Through walk-ins, general referrals from governmental agencies and other ad program provides counseling and testing services for persons alleging violations of fair housing in rental, s financing and appraisals to ameliorate racially segregated housing patterns in metropolitan Milwaukee. | | program provides counseling and testing services for persons alleging violations of fair housing in rental, sale, insurance, | |
| | Fair Lending - Advocates for the removal of institutional barriers to private sector investments in Milwaukee neighborhoods. Monitors compliance with lending laws and promotes partnership development activity with institutions to reduce the patterns of segregation and to increase minority lending practices in metro Milwaukee | | |
| 10 | Goal Name | Accessible Rehab | |
| | Goal Description | These activities include: Housing accessibility improvements for income eligible persons with physical, visual and hearing disabilities. Improvements can include handicap accessible ramps, bathroom, kitchen, bedroom and living room modifications, safety enhancements and assistive devices. | |
| 11 Goal Name Code Enforcement | | Code Enforcement | |
| | | These activities include efforts undertaken primarily in deteriorated areas under the stress of absentee ownership or areas being renewed to address and arrest the decline in a designated blighted area. | |
| | | The following following code enforcement issues will be addressed: Building Code Enforcement, Neighborhood Clean-Ups, Neighborhood Improvement Program, Landlord/Tenant Compliance. | |

| 12 | Goal Name | Shelter/Domestic Abuse | |
|----|--|---|--|
| | Goal Description | These activities include housing and services for homeless individuals and families, victims of domestic violence and troubled youth, including assistance with obtaining appropriate supportive services, permanent housing, transitional housing, medical and mental health treatment, counseling, supervision, street outreach, and other services essential for achieving independent living. | |
| 13 | Goal Name | Vacant/Blighted Real Estate | |
| | Goal Description | This activity is not funded in 2017. | |
| 14 | Goal Name | HOPWA | |
| | Goal Description | These activities include housing & supportive services for persons with HIV/AIDS to facilitate housing stability, independence and improve quality of life for eligible persons in the 4-County Metropolitan Milwaukee area. | |
| 15 | Goal Name Homeless Services-Emergency Solutions Grants | | |
| | Goal Description | This project will provide emergency, transitional and permanent housing; supportive services; case management; homeless prevention; tenant-based rental assistance; housing relocation & services; rapid re-housing; street outreach; housing & services for homeless youth and victims of domestic violence. | |

Projects

AP-35 Projects – 91.220(d)

Introduction

CDGA proposes to target funding to areas with the greatest need, namely the Neighborhood Revitalization Strategy Areas (NRSAs), which based on *Year 2010* Census data, has the highest number of low income persons in the City of Milwaukee. In each of the NRSAs, at least 70% of the total population falls within the HUD-defined low/moderate income category. Funding is also allocated for low income persons in non-NRSA census tracts within the City of Milwaukee.

Projects

| # | Project Name | | |
|----|---|--|--|
| 1 | NRSA Area #1 | | |
| 2 | NRSA Area #2 | | |
| 3 | Citywide | | |
| 4 | Administration | | |
| 5 | Fair Housing | | |
| 6 | Accessible Rehab | | |
| 7 | Code Enforcement | | |
| 8 | Shelter/Domestic Abuse | | |
| 9 | Vacant/Blighted Real Estate | | |
| 10 | 2017 AIDS Resource Center of Wisconsin WIH17F001 (ARCW) | | |
| 11 | 2017 Richard's Place WIH17F001 (RP) | | |
| 12 | 2017 City of Milwaukee WIH17F001 (MILW) | | |
| 13 | ESG17 Milwaukee | | |

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

<u>Housing:</u> There is a great need for affordable units for those experiencing severe cost burden where more than 30% and 50% of their income is for housing costs. Other problems include: foreclosed and abandoned properties, decreasing owner occupancy, decline in housing values, dislocation of tenants due to foreclosures, quality of housing stock, lack of resources for housing maintenance and repairs. In addition, there is sometimes community opposition to affordable housing developments.

<u>Public Services:</u> As identified through the community input process, there is a need for the following public services in the City of Milwaukee: Employment services, youth programs, services for homeless

persons and those with mental, physical and/or developmental disabilities, elderly persons, crime prevention/neighborhood safety, neighborhood improvement initiatives, community organizing, access to affordable health care.

<u>Economic Development:</u> These needs include expansion of opportunity in the areas of employment, education, economic development, job creation, poverty reduction programs, technical and financial assistance to businesses for job creation.

AP-38 Project Summary

Project Summary Information

| 1 | Project Name | NRSA Area #1 |
|---|---|---|
| | Target Area | NRSA AREA #1 |
| | Goals Supported | Affordable Housing Economic Development Public Services |
| | Needs Addressed | Affordable Housing Economic Development Neighborhood Strategic Planning Public Services |
| | Funding | CDBG: \$4,370,280 HOME: \$1,989,717 |
| | Description | This project is a neighborhood revitalization strategy area and will be involved in the following strategic issues: housing, economic development, neighborhood strategic planning, community organizing, youth services and public services-general. |
| | Target Date | 12/31/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | These activities will benefit approximately 899,232 low and moderate income individuals, families, families with children, elderly and other stakeholders in NRSA Area 1. |
| | Location Description | NRSA Area 1 |
| | Planned Activities | This project is a neighborhood revitalization strategy area and will be involved in the following strategic issues: housing, economic development, neighborhood strategic planning, community organizing, youth services and public services-general. |
| 2 | Project Name | NRSA Area #2 |
| | Target Area | NRSA AREA #2 |
| | Goals Supported | Affordable Housing Economic Development Public Services |
| | Needs Addressed | Affordable Housing Economic Development Neighborhood Strategic Planning Public Services |

| | Funding | CDBG: \$1,154,720 |
|---|---|---|
| | | HOME: \$1,237,500 |
| | Description | This project is a neighborhood revitalization strategy area and will be involved in the following strategic issues: housing, economic development, neighborhood strategic planning, community organizing, youth services and public services-general. |
| | Target Date | 12/31/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | These activities will benefit approximately 399,922 low and moderate income individuals, families, families with children, elderly and other stakeholders in NRSA Area 2. |
| | Location Description | NRSA Area 2 |
| | Planned Activities | This project is a neighborhood revitalization strategy area and will be involved in the following strategic issues: housing, economic development, neighborhood strategic planning, community organizing, youth services and public services-general. |
| 3 | Project Name | Citywide |
| | Target Area | City of Milwaukee |
| | Goals Supported | Affordable Housing Economic Development Public Services Planning Clearance & Demolition CDBG Non Profit Organization Capacity Building |
| | Needs Addressed | Affordable Housing Economic Development Neighborhood Strategic Planning Public Services Planning Clearance and Demolition CDBG Non Profit Organization Capacity Building |
| | Funding | CDBG: \$3,788,297 HOME: \$679,000 |

| | Description | This project will address the following Citywide strategic issues: Economic development, Housing, Planning, Public services, NSP/Community Organizing, Employment services, Demolition and Blight removal, and CDBG Non-profit organization capacity building. |
|---|---|--|
| | Target Date | 12/31/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | It is estimated that approximately 1,865 low income persons will benefit from the proposed activities. |
| | Location Description | City of Milwaukee |
| | Planned Activities | Affordable housing, Economic development, Lead abatement, NSP/Community Organizing, Public services(employment services, Teacher in Library, Driver's license recovery, Milwaukee Fatherhood Initiative, Summer Youth Internship), Continuum of Care Planning, Capacity Building for community-based organizations |
| 4 | Project Name | Administration |
| | Target Area | City of Milwaukee |
| | Goals Supported | Administration |
| | Needs Addressed | Administration |
| | Funding | CDBG: \$1,791,500 HOME: \$420,000 |
| | Description | Administration of all Federally funded entitlement programs. |
| | Target Date | 12/31/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | Not Applicable |
| | Location Description | Not Applicable |
| | Planned Activities | Administration of all Federally funded entitlement programs. |
| 5 | Project Name | Fair Housing |
| | Target Area | City of Milwaukee |
| | Goals Supported | Fair Housing |

| Needs Addressed | Fair Housing |
|---|--|
| Funding | CDBG: \$137,500 |
| Description | Ameliorate racially segregated housing patterns in Metropolitan Milwaukee through the following activities: Fair Housing: Public Education - Public education program that includes presentations on fair housing laws, programs for homeowners on discriminatory homeowner insurance practices, fair housing training seminars, technical assistance on fair housing compliance and housing information referral service to ameliorate racially segregated housing patterns in the metropolitan Milwaukee area. |
| Target Date | 12/31/2017 |
| Estimate the num and type of famili that will benefit for the proposed activities | activities with approximately 2,000 benefitting from the educational |
| Location Descript | ion Citywide |
| Planned Activities | Fair Housing Enforcement - Through walk-ins, general referrals from governmental agencies and other advocacy groups, program provides counseling and testing services for persons alleging violations of fair housing in rental, sale, insurance, financing and appraisals. Fair Lending-Advocates for the removal of institutional barriers to private sector investments in Milwaukee neighborhoods. Monitors compliance with lending laws and promotes partnership development activity with financial institutions to reduce the patterns of segregation and to increase minority lending practices in metro Milwaukee. Conduct Fair Housing public education; Fair Housing enforcement and Fair Lending practices. Address issues of predatory lending. |
| 6 Project Name | Accessible Rehab |
| Target Area | City of Milwaukee |
| Goals Supported | Accessible Rehab |
| Needs Addressed | Accessible Rehab |
| Funding | CDBG: \$40,000 |

| T T | |
|--|--|
| Description | Housing Accessibility Program- Housing accessibility improvements for income eligible persons with physical, visual and hearing disabilities. Improvements can include handicap accessible ramps, bathroom, kitchen, bedroom and living room modifications and safety enhancements. |
| Target Date | 12/31/2017 |
| Estimate the numbe and type of families that will benefit from the proposed activities | these activities. |
| Location Description | Citywide |
| Planned Activities | Construct handicapped accessible ramps and other accessibility modifications for income eligible, disabled homeowners. |
| 7 Project Name | Code Enforcement |
| Target Area | City of Milwaukee |
| Goals Supported | Code Enforcement |
| Needs Addressed | Code Enforcement |
| Funding | CDBG: \$2,035,000 |
| Description | Code Enforcement Program - Efforts undertaken in a deteriorated area being renewed to address and arrest the decline in a designated blighted area. This project will address the following code enforcement issues: Building Code enforcement, Landlord/Tenant issues and neighborhood cleanups. |
| Target Date | 12/31/2017 |
| Estimate the numbe and type of families that will benefit from the proposed activities | , ' |
| Location Description | Citywide |
| Planned Activities | Building Code enforcement, Landlord/Tenant compliance and neighborhood cleanups. |
| 8 Project Name | Shelter/Domestic Abuse |
| Target Area | City of Milwaukee |

| | Goals Supported | Shelter/Domestic Abuse |
|----|---|--|
| | Needs Addressed | Shelter/Domestic Abuse |
| | Funding | CDBG: \$1,155,000 |
| | Description | This project will address the following strategic issues for the homeless populations: CDBG emergency, transitional and permanent housing and self sufficiency programs, homeless prevention, domestic violence prevention & intervention. |
| | Target Date | 12/31/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | It is estimated that 3,765 persons will benefit from these activities. |
| | Location Description | Citywide |
| | Planned Activities | Emergency and transitional shelter, case management and supportive services, homeless prevention, coordinated entry, shelter and services for victims of domestic violence, runaway/troubled youth and abused/neglected children. |
| 9 | Project Name | Vacant/Blighted Real Estate |
| | Target Area | City of Milwaukee |
| | Goals Supported | Vacant/Blighted Real Estate |
| | Needs Addressed | Vacant/Blighted Real Estate |
| | Funding | |
| | Description | This project will involve the acquisition of blighted properties for eventual redevelopment |
| | Target Date | |
| | Estimate the number and type of families that will benefit from the proposed activities | Not Applicable |
| | Location Description | Not Applicable |
| | Planned Activities | No planned activities. |
| 10 | Project Name | 2017 AIDS Resource Center of Wisconsin WIH17F001 (ARCW) |

| | Target Area | 4-County Metro Milwaukee area |
|----|---|--|
| | Goals Supported | HOPWA |
| | Needs Addressed | HOPWA |
| | Funding | HOPWA: \$549,242 |
| | Description | This project will continue collaborations with HIV/AIDS service providers to determine current needs of persons with HIV/AIDS, and to identify service and funding gaps in order to provide coordinated case management services and assistance in obtaining housing and services to promote quality of life and self sufficiency. |
| | Target Date | 12/31/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | It is estimated that 100 persons will benefit from the proposed activities. |
| | Location Description | 4 County Metro Milwaukee Area |
| | Planned Activities | This project will continue collaborations with HIV/AIDS service providers to determine current needs of persons with HIV/AIDS, and to identify service and funding gaps in order to provide coordinated case management services and assistance in obtaining housing and services to promote quality of life and self sufficiency. |
| 11 | Project Name | 2017 Richard's Place WIH17F001 (RP) |
| | Target Area | 4-County Metro Milwaukee area |
| | Goals Supported | HOPWA |
| | Needs Addressed | HOPWA |
| | Funding | HOPWA: \$114,290 |
| | Description | This project will continue collaborations with HIV/AIDS service providers to determine current needs of persons with HIV/AIDS, and to identify service and funding gaps in order to provide coordinated case management services and assistance in obtaining housing and services to promote quality of life and self sufficiency. |
| | Target Date | 12/31/2017 |

| | Estimate the number and type of families that will benefit from the proposed activities | It is estimated that 8 persons will benefit from the proposed activities. |
|----|---|--|
| | Location Description | 4 County Metro Milwaukee Area. |
| | Planned Activities | This project will continue collaborations with HIV/AIDS service providers to determine current needs of persons with HIV/AIDS, and to identify service and funding gaps in order to provide coordinated case management services and assistance in obtaining housing and services to promote quality of life and self sufficiency. |
| 12 | Project Name | 2017 City of Milwaukee WIH17F001 (MILW) |
| | Target Area | 4-County Metro Milwaukee area |
| | Goals Supported | HOPWA |
| | Needs Addressed | HOPWA |
| | Funding | HOPWA: \$15,254 |
| | Description | Administration and oversight of the HOPWA program for the 4-County Metropolitan Milwaukee area. |
| | Target Date | 12/31/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | Not Applicable |
| | Location Description | 4 County Metro Milwaukee Area. |
| | Planned Activities | Administration and oversight of the HOPWA program for the 4-County Metropolitan Milwaukee area. |
| 13 | Project Name | ESG17 Milwaukee |
| | Target Area | City of Milwaukee |
| | Goals Supported | Homeless Services-Emergency Solutions Grants |
| | Needs Addressed | Homeless Services-Emergency Solutions Grants |
| | Funding | ESG: \$2,041,570 |

| Description | This project will provide emergency, transitional and permanent housing; supportive services; case management; homeless prevention; tenant-based rental assistance; housing relocation & services; rapid re-housing; housing & services for homeless youth and victims of domestic violence. |
|---|--|
| Target Date | 12/31/2017 |
| Estimate the number and type of families that will benefit from the proposed activities | It is estimated that 9,000 persons will benefit from these services. |
| Location Description | City of Milwaukee |
| Planned Activities | Emergency, transitional and permanent housing; supportive services; case management; homeless prevention; tenant-based rental assistance; housing relocation & services; rapid re-housing; housing & services for victims of domestic violence. |

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

CDGA proposes to target funding to areas with the greatest need, namely the Neighborhood Revitalization Strategy Areas (NRSAs), which based on *Year 2010* Census data, has the highest number of low income persons in the City of Milwaukee. In each of the NRSAs, at least 70% of the total population falls within the HUD-defined low/moderate income category. Funding is also allocated for low income persons in non-NRSA census tracts within the City of Milwaukee.

The census tracts for NRSA 1 are as follows:

11,12,13,14,15,19, 20,21,22,23,24,25,26,27,28,37,38,39,40, 41,42,43, 44,45,46, 47,48,49,50,59,60,61,62,63,64,65,66,67, 68, 69,70,79,80,81,84, 85,86, 87, 88,89, 90, 91,92,93,96,97,98,99,106, 107,122, 123,133,134,135,136,137,141, 146,147,148,149,1854,1855,1856,1857,1858,1859,1860,1861,1862, 1864.

The census tracts for NRSA 2 are as follows:

157,158,159,160,161,162,163,164,165,166,167,168,169,170, 171,173,174,175,176,186,187,188,1865,1866

Geographic Distribution

| Target Area | Percentage of Funds |
|-------------------------------|---------------------|
| NRSA AREA #1 | 29 |
| NRSA AREA #2 | 11 |
| City of Milwaukee | 57 |
| 4-County Metro Milwaukee area | 3 |

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

CDGA proposes to target funding to areas with the greatest need, namely the Neighborhood Revitalization Strategy Areas (NRSAs), which based on *Year 2010* Census data, has the highest number of low income persons in the City of Milwaukee. In each of the NRSAs, at least 70% of the total population falls within the HUD-defined low/moderate income category. Funding is also allocated for low income persons in non-NRSA census tracts within the City of Milwaukee. The major emphasis is on targeting resources to effectuate neighborhood revitalization by integrating housing, economic development and

public services in a tightly defined geographic area through a clear and well planned development strategy.

Discussion

There continues to be racial and ethnic concentrations both within the City of Milwaukee and in the Milwaukee Metropolitan Statistical Area(MMSA). According to the *U.S. Census, 2010*, there is a pattern of concentration of all minorities within the area generally considered to be the "central city." The concentration still remains greatest for African Americans and has been noted by several local and national research studies. Most marked is the concentration of African Americans within the city limits and the fact that only 1.5% of the suburban population of the four-County Milwaukee Metropolitan Area is Black.

Milwaukee's residential segregation has been studied for decades by local and national researchers and policymakers. The tremendous impact on the gaps between Black and Whites as it relates to income, mortgage loan disparity rates and educational attainment, has been cited in numerous national studies. It is important to note the overlay of economic segregation as this impacts employment and other opportunities for minorities. CDGA-funded programs providing "seed capital" for new economic development activities continues to be a high priority as a means of stimulating economic opportunities including job creation - for Milwaukee residents in the identified Neighborhood Revitalization Strategy Areas (NRSAs).

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The Community Development Grants Grant Administration (CDGA) has defined a Housing and Community Development 5-Year Strategy which focuses on creating viable neighborhoods and providing decent and affordable housing and economic opportunity for all residents. This community vision recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and access to community social services. The City will continue to encourage CDBG, HOME and other HUD-funded project recipients to include work experience opportunities in their housing rehab and new construction projects and to link their projects with other public and private human service, resident organizing and economic development initiatives. The City will utilize CDBG and HOME entitlement funds to accomplish the specific housing goals along with other leveraged resources. In addition, the City will continue to expand collaborations with lenders, businesses, developers, other governmental entities, community stakeholders and other development resources such as WHEDA and Community Development Financial Institutions (CDFIs) to expand available resources.

| One Year Goals for the Number of Households to be Supported | |
|---|-------|
| Homeless | 0 |
| Non-Homeless | 1,605 |
| Special-Needs | 0 |
| Total | 1,605 |

Table 9 - One Year Goals for Affordable Housing by Support Requirement

| One Year Goals for the Number of Households Supported Through | |
|---|-------|
| Rental Assistance | 0 |
| The Production of New Units | 12 |
| Rehab of Existing Units | 1,588 |
| Acquisition of Existing Units | 5 |
| Total | 1,605 |

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The need to focus on neighborhoods as a whole as well as individual housing units is well supported by the data. Over the past several years, various City departments have worked in collaboration with citizens and community-based agencies on initiatives to strengthen neighborhoods. By involving citizens in code enforcement, graffiti abatement, crime prevention, neighborhood cleanups, lead abatement

and housing development, such as the Milwaukee Builds Housing Apprenticeship Program, community cohesion is improved while the physical appearance and safety of neighborhoods is enhanced.

The lack of adequate safe, decent and affordable housing in Milwaukee is the greatest obstacle in meeting the housing needs of Milwaukee's low income citizens. In addition, the lack of adequate jobs at family supporting wages is a major obstacle in obtaining housing and achieving safe and viable neighborhoods. The lack of jobs creates the cycle of poverty that leads to economic segregation, the flight of the middle class to the suburbs, physical deterioration of neighborhoods and a variety of social ills such as high crime, teen pregnancy and illiteracy. In addition, the lack of adequate funding for housing providers to meet the tremendous demand, coupled with capacity issues, all pose challenges to meeting underserved housing needs.

The City will develop, maintain and expand the supply of affordable, safe and decent housing that is accessible to income eligible persons; expand opportunities for low income citizens to access affordable housing; increase maintenance and improvement of existing units; assist in preserving existing housing units.

AP-60 Public Housing – 91.220(h)

Introduction

The mission of the Housing Authority of the City of Milwaukee is to provide decent, quality, safe and affordable housing with transition options for those who desire them. "Transition option" is defined as the opportunity for residents to self-determine their interest in, and have access to, housing options that support long-term self-sufficiency.

The Housing Authority of the City of Milwaukee manages 3,571 public housing units.

Most of the housing units are in good to excellent condition; however, the configuration of the apartments in the round towers are challenging for the staff and its residents. The Housing Authority is in the process of revitalizing its' Westlawn public housing development and is continuing to revitalize its Scattered Sites portfolio.

The Housing Authority maintains two separate wait lists for its public housing program: 1) the family wait list, and 2) the elderly/near elderly/disabled wait list.

Actions planned during the next year to address the needs to public housing

The following information in this section is excerpted from the Housing Authority's Agency Plan that was approved by the Dept. of Housing & Urban Development.

Actions planned during the next year:

Increase the availability of decent, safe, and affordable housing; maximize the number of affordable units available to the PHA within its current resources; promote self-sufficiency and asset development of families and individuals; conduct activities to affirmatively further fair housing; increase awareness and target PHA resources among families of races and ethnicities with disproportionate needs and to families with disabilities; target available assistance to the elderly and families at or below 30% and 50% of AMI.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Housing Authority is governed by seven Commissioners, two of whom are public housing residents. It is their responsibility to determine Housing Authority policy and assure agency compliance with all applicable state laws and federal regulations. The Housing Authority will continue to support the Resident Advisory Board, which is the organization that represents the residents of the entire Housing Authority of the City of Milwaukee (HACM) and includes representatives from HACM's housing developments and the Rent Assistance Program. The Housing Authority meets with the Resident

Advisory Board (RAB) on a monthly basis. The RAB assists the Housing Authority with the development and implementation of policies and plans, including the Annual Plan. In addition to the Resident Advisory Board, each of the Housing Authority's developments has a Resident Council that meets on a monthly basis to discuss policies and procedures, programs and activities that affect their housing development. Both the RAB and the Resident Councils also receive a small amount of HUD funding every year to help fund resident participation activities.

HACM has also worked to improve resident leadership capacity by providing training and technical assistance to resident leaders.

HACM works closely with the City of Milwaukee to leverage funding and other resources to address public housing needs. Two specific examples of the City's partnership with the Housing Authority is the City's participation in the Choice Neighborhoods Implementation grant and the Neighborhood Stabilization Program. The Department of City Development is the Neighborhood Implementation Entity for the Choice Neighborhoods grant, and If the Housing Authority receives a Choice Neighborhoods grant, the City will provide Community Development Block Grant funds to support eligible activities in the Westlawn Transformation Plan. The Housing Authority was a subgrantee on the Neighborhood Stabilization Program (NSP) grant and is continuing to work with the Department of City Development on the implementation plan to address abandoned and foreclosed properties in the City of Milwaukee.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable. The City of Milwaukee Housing Authority is not designated as troubled.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i) Introduction

Persons with special needs as well as the homeless are an important concern for the City as it is recognized that addressing the needs of all citizens, regardless of their circumstance, is an essential component to strengthening neighborhoods.

To further the City's strategic goal of reducing and preventing homelessness and domestic violence in our community, the City will continue to allocate CDBG and Emergency Solutions Grant (ESG) funds for activities geared to assist homeless persons achieve stable housing and self-sufficiency. These funds will be provided to conduct outreach and homeless prevention activities, to operate shelter facilities, provide supportive services, legal assistance and other services aimed at preventing and reducing homelessness for individuals, families, runaway/homeless youth, victims of domestic violence and mentally and physically disabled persons.

The jurisdiction will utilize a variety of resources to address homelessness in Milwaukee, including but not limited to: U.S. Dept. of Housing & Urban Development, State of Wisconsin Dept. of Health & Human Services, Emergency Food & Shelter Program (FEMA), State Runaway Grant, State of Wisconsin ESG/THP/HPP; City of Milwaukee ESG, City of Milwaukee CDBG, State Shelter Subsidy Grant; United Way of Greater Milwaukee, numerous foundations and individual donors.

In addition, the City of Milwaukee will continue as the Continuum of Care Lead Agency, including involvement in activities to advance the <u>10-Year Plan to End Homelessness</u> which is the plan approved by the City of Milwaukee as its jurisdictional plan to end homelessness.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Outreach and Coordinated Entry

Outreach and coordinated entry are the foundation for a strong and effective homeless services system. Linking people who are at imminent risk of homelessness with resources to sustain permanent housing in the community is a critical component of an early intervention system. Making sure that people who have no other option than shelter are referred to the most appropriate setting is as important. Milwaukee's street outreach network works in tandem with Coordinated Entry to connect people with services and resources that match their immediate needs while emphasizing permanent housing solutions.

Street outreach will continue to be provided to homeless adults and youth. Outreach will engage homeless people on the street, in parks, under bridges, encampments, and abandoned buildings. Outreach workers will provide food, clothing and personal care items as immediate assistance and connect homeless with HIV testing, substance abuse services, benefits assistance, and access to shelter, transitional housing, safe haven, and permanent supportive housing. This collaborative effort has much improved the use of outreach resources in Milwaukee and has resulted in a significantly increased number of people who are homeless, especially chronically homeless, being able to access needed health, financial and housing resources. The collaborative is also a primary outreach vehicle for Milwaukee County's Housing First Initiative, slated to house 300 chronically homeless individuals by 2017. Goal: 8,500 homeless encounters annually

Engagement of homeless children and families in the Homeless Education Program operated by the Milwaukee Public Schools (primary LEA in Milwaukee County) is a major priority for the Continuum of Care and an area of great collaboration and success over the past ten years. A representative of the LEA sits on the CoC Executive Board and is an active part of the Shelter and Transitional Housing Task Force (an arm of the CoC) and numerous special focus work groups. Homeless children are immediately connected to HEP when they enter a CoC program. HEP then quickly arranges school transportation to ensure no disruption in school attendance and enrolls the family in HEP. This means that children can receive all HEP services including free breakfast/lunch, before/after school programs, tutoring, fee waivers, free books/materials, ESL, school health, special education and all other HEP authorized services. HEP staff regularly provides training for emergency shelter, transitional housing and permanent housing staff and conducts regular on-site visits to answer questions and maintain good communication.

Goal: 3,700 homeless students served annually

Coordinated Entry (CE) is fully implemented for families and single women and men seeking emergency shelter. Coordinated Entry functions as a one-call system operated by 211 at IMPACT, accessible via phone call, text message and online. Each caller's situation is assessed using the Vulnerability Index (VI) which examines current living situation, health, mental health, income, veteran status, presence of domestic violence and other factors. When completed, the VI generates a 'score' that is used to prioritize callers for placement in emergency shelter. In 2015, a total of 2,787 adults and children were served by the Continuum of Care emergency shelters; other callers to Coordinated Entry with less urgent levels of need were referred to 211's extensive network of supportive services. Goal: 24,000 CE callers served annually

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency and Transitional Housing

Emergency shelter and transitional housing are resources for individuals and families in greatest need who have no other housing option in the community. Homelessness prevention and rapid re-housing are strategies intended to reduce the reliance on emergency shelter and transitional housing and

increase the rate of successful placement in permanent unsubsidized or supportive housing in the community.

<u>Emergency shelter</u> capacity is currently 235 beds for families, 452 beds for single adults, and 16 beds for unaccompanied youth. No additional emergency shelter capacity is required or planned.

Goal: 1,200 people served as members of households; 1,200 people served as single adults annually with the number decreasing over the next five years

<u>Transitional housing</u> (and Safe Haven) capacity is currently 485 beds for families, 310 beds for single adults, 109 beds earmarked specifically for veterans, and 30 beds for unaccompanied youth. Continued efforts to seek reallocation of CoC-funded transitional housing projects to permanent supportive housing for chronically homeless individuals and/or families and/or rapid-re-housing for families is planned for 2017 to support the Continuum of Care's increasing emphasis on Housing First.

Special populations will continue to receive emergency shelter and transitional housing services tailored to their unique needs. Included in this category are veterans, veterans' families, victims of domestic violence, people with HIV/AIDS, and unaccompanied youth.

Goal: 450 persons served as members of households; 600 people served as single adults annually with the number decreasing every year over the next five years.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Transition to Permanent Housing

<u>Reducing the Length of Time Homeless</u> is a major priority for the CoC. In 2016, the average length of time homeless (LOTH) for Emergency Shelter and Safe Haven was 50.3 days, a slight decline from 2015 when the LOTH was 50.8 days. The CoC's plan to reduce the LOTH includes expanded Rapid Re-housing capacity, full implementation of the Housing First Initiative and creation of new PSH beds for people who are chronically homeless.

Rapid Re-housing is a growing resource for homeless families in Milwaukee. Currently, the CoC has 158 Rapid Re-housing beds for families (10 operated by the Center for Veterans Issues and 148 by Hope

House) with both qualified as low-barrier programs. Reallocation of Outreach Community Health Centers Transitional Housing Program to RRH planned for 2017 will add 196 beds to the RRH inventory for a total of 354 family RRH beds, potentially serving 118-141 families annually. This capacity could serve an estimated 44% of the high priority families identified by Coordinated Entry annually. First year experience at Hope House showed an average time between RRH enrollment and move-in of just 23 days, reaffirming RRH as an effect housing first option for many families.

Goal: 354 served in families with children with the number increasing every year over the next five years; Reduction in Length of Stay

Permanent Supportive Housing capacity is currently 427 beds for people in families with children, 1,020 beds for single adults, 165 beds for people who are chronically homeless, and 183 beds for veterans. The CoC has very aggressively pursued opportunities to increase PSH capacity, especially for people who are chronically homeless. Between 2013 and 2015, the CoC reallocated an SSO project to create 13 new PSH beds for chronically homeless; converted 25 Shelter + Care beds operated by Milwaukee County to dedicated CH use; implemented the policy that 100% of PSH beds available via turnover are prioritized for chronically homeless; and began implementation of the City/County Housing First Initiative. In addition, Friends of Housing has reallocated its Transitional Housing Program to PSH for CH families and singles; and the CoC has established policies reinforcing Housing First and Low Barrier across its system. In addition, this year's HUD application included a Milwaukee County request for a 160-bed PSH/CH bonus project

The plan to increase Permanent Supportive Housing includes:

- Reallocation of additional Transitional Housing beds to PSH
- Acquisition of additional TBRA (Tenant-Based Rent Assistance) to support Housing First efforts
- Development of a Housing First endowment to fund supportive services/case management for people in PSH
- Careful monitoring of PSH residents to determine eligibility for other non-CoC rent subsidy programs
- Partnership with private housing developers to increase PSH capacity in Milwaukee

Goal: Increase the number of PSH beds dedicated for use by the chronically homeless with ongoing increases to address need as quantified by Point in Time and HMIS data

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving

assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

<u>Homelessness prevention</u> is an area of increasing emphasis for the CoC, particularly in light of the significant percentage of people who contact Coordinated Entry whose situations qualify them as Category 2 (49.4%); these are individuals and people in families experiencing housing instability but they are temporarily staying with family or friends. Many are first-time homeless. In 2014, 66.1% of people entering the CoC system (Emergency Shelter, Safe Haven, Transitional Housing and Permanent Housing) were homeless for the first time. The CoC's plan is to reduce the number of first time homeless by making referrals to Community Advocates Homeless Prevention Programs for eviction prevention, utility aid and rent assistance and to Cathedral Center for Community Case Management. Both programs emphasize keeping individuals and families housed in the community without the disruption caused by shelter stays.

In addition to these two specific programs, system-wide efforts focused on preventing homelessness including:

- 1. Insuring that Coordinated Entry is widely publicized and utilized by residents of the entire county so that people at risk of homelessness can gain accessed to prevention services relating to basic needs, income, employment, transportation, and other assistance;
- 2. Providing ESG-funded prevention services including housing relocation, stabilization and tenant-based rental assistance:
- 3. Increasing utilization of cash and non-cash mainstream resources;
- 4. Supporting efforts to provide special intervention to achieve permanent housing placement for people leaving foster care, hospitals, mental health facilities, and corrections;

Preventing discharges to homelessness by institutions will be addressed by the CoC by 1) maintaining good communication with institutions' discharge planning entities including health care facilities, mental health facilities, foster care and corrections; 2) providing case by case assistance to help discharged individuals avoid homelessness and obtain secure housing with an emphasis on acquiring permanent supportive housing; 3) activating community resources such as CCS (Comprehensive Community Services) to provide case management to vulnerable populations; and 4) fully implementing Housing First to break the cycle of institutional stays and help vulnerable homeless to acquire and maintain safe housing. In 2015, 10.4% (207) of people coming into Emergency Shelter had been discharged from institutional settings. Of the 207, the discharges occurred as follows: psychiatric hospital 22.2%, substance abuse treatment facility 12.6%, hospital 21.3%, corrections 39.1% and foster care 4.8%.

Goal: Decrease in the number of individuals and families with children who become homeless as evidenced by entry into emergency shelter

Discussion

Reduction in the Rate of Return will continue to be tracked using an HMIS-generated Rate of Return (RoR) report to identify homelessness or return to shelter after exiting any CoC-funded housing program. The CoC will also continue to use RoR as a criterion in the annual HUD renewal project ranking.

The plan to reduce the Rate of Return includes:

- -Increasing income through utilization of cash and non-cash mainstream resources including SSI/SSDI;
- -Increasing employment through collaboration with employment service providers;
- -Achieving maximum enrollment in Affordable Care Act health insurance; and
- -Improving access and utilization of mental health and substance abuse services

Goal: Reduction in rate of return to national best practice levels

AP-70 HOPWA Goals-91.220 (I)(3)

| One year goals for the number of households to be provided housing through the use of HOPWA for: | | |
|--|-----|--|
| Short term rent, mortgage, and utility assistance to provent homologeness of the individual or | | |
| Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or | 400 | |
| family | 108 | |
| Tenant-based rental assistance | 0 | |
| Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds | 0 | |
| Units provided in transitional short-term housing facilities developed, leased, or operated with | | |
| HOPWA funds | 0 | |
| Total | 108 | |

AP-75 Barriers to affordable housing - 91.220(j)

Introduction:

The City of Milwaukee: <u>Analysis of Impediments to Fair Housing</u> study identifies numerous impediments some of which present barriers to affordable housing, fair housing and housing choice. The following is a summary of those impediments.

Summary of Impediments:

- Institutional and governmental policies and regulations which affect income and housing
- Non-coherent Federal housing mandates and Federal and State transportation policies
- Lack of enforcement mechanism for complaints of discrimination
- Lack of housing units accessible to persons with disabilities
- Overcrowded housing
- Lack of affordable housing supply
- Cuts in funding to Section 8 Housing Choice Voucher Program
- Lack of a Regional Housing Strategy or Plan
- Attack on the Community Reinvestment Act (CRA)
- Suburban policies (NIMBYism, impact fees, exclusionary zoning codes, exclusionary public housing or Section 8 Rent Assistance vouchers, inadequate public transportation).
- Social class, racial and cultural barriers
- Housing and employment discrimination
- Residential segregation
- Inadequate income
- Racial disparities in mortgage lending
- Insurance redlining; appraisal practices
- Racial steering

In accordance to 24 CFR § 5.156 and compliance with the submission of the Five year Consolidated Plan the City of Milwaukee will be a collaborator with the Greater Milwaukee Foundation, United Way of Greater Milwaukee & Waukesha, Two Counties, Three cities and Five Public Housing Authorities (City of Milwaukee, City of Milwaukee)

Housing Authority, Milwaukee County, Milwaukee County Housing Authority City of South Milwaukee Housing Authority, City of West Allis, City of West Allis Housing Authority, City of Wauwatosa, Waukesha County, Waukesha County Housing Authority) in the South Eastern Wisconsin Region working together to prepare a regional Affirmatively Furthering Fair Housing Plan(AFFH) plan.

The regional plan will evaluate barriers to opportunity for persons in protected classes and serve in

conjunction with the communities' Five Year Consolidated Plans. The regional AFFH plan will ask communities to consider both place-based challenges and people-based challenges. In addition, the plan will focus considerable attention on understanding the situation for those living in areas of concentrated poverty and persons of color (Racially and Ethnically Concentrated Areas of Poverty). The plan will also concentrate extensively on steps to increase access to opportunity through education, transportation, jobs and environmental conditions with a regional lens and a thorough Citizen Participation outreach plan.

Time line:

The Request for Proposal let August 4th, 2017

Vendor Start, September 8th, 2017

Regional AFFH Plan Completion October, 2018

A copy of the most recent Analysis of Impediments could not be submitted electronically through IDIS, therefore the City of Milwaukee will submit a copy via email to our local HUD office.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City of Milwaukee will continue to fund multiple housing and other programs designed to affirmatively market Milwaukee neighborhoods and reduce barriers to affordable housing. These programs support the administration and enforcement of federal, state and local fair housing ordinances, provide homebuyer counseling services and collaboratively work with financial lenders to enable low and moderate-income families to purchase homes anywhere they choose. Viewed holistically, these programs accomplish several purposes at once: they affirmatively promote neighborhoods; enforce and further fair housing; expand on housing opportunities available to minorities and the poor within and outside of areas of minority concentration and help to strengthen neighborhoods by increasing homeownership and eliminating blight.

The City has recently enacted an ordinance which allows the City to use their TIF authority to subsidize affordable housing. The ordinance allows the City to extend one additional year the increments of an expiring TIF development in a defined area for one additional year, and dedicate it to other affordable housing projects. The City of Milwaukee is the State's first municipality to enact this ordinance using the State's enabling legislation.

The City also continues to provide funding and staff to the City of Milwaukee Housing Trust Fund. The Housing Trust Fund has been able to address some of the city's housing needs through gap financing and Annual Action Plan

other means for the last several years. Increasing homeownership, increasing the supply of quality rental housing opportunities and providing housing opportunities for the homeless are three of the trust fund's goals.

The City's Strong Neighborhoods Initiative is assisting the City and local nonprofits in more effectively addressing the housing foreclosure crisis and its impacts on our neighborhoods. Neighborhoods of color are disproportionately harmed by the foreclosure crisis.

City Subcontracts with Fair Housing Programs

The City will subcontract with the Metropolitan Milwaukee Fair Housing Council (MMFHC) and the Legal Aid Society of Milwaukee to respond to the problem of predatory lending and affirmatively work toward integrated housing patterns.

Metropolitan Milwaukee Fair Housing Council (MMFHC) will affirmatively work toward integrated housing patterns by providing: fair housing/ fair lending presentations, research and technical assistance on fair housing/ fair lending issues, information on buying, renting and selling homes, counseling and investigation services to receive and resolve fair housing/fair lending complaints and distribution of a quarterly fair housing newsletter and a coordinated community-wide response to the problem of predatory lending.

The <u>Legal Aid Society of Milwaukee</u>, Inc., will continue to operate its' A-LINE Project and represent vulnerable inner city residents who have been victims of predatory lending practices. Legal Aid Society will continue to provide direct representation to victims of predatory mortgage lending practices and mortgage foreclosure rescue scams. Legal Aid will continue its efforts to challenge the unconscionable practices of auto title lenders in our community.

See attached addendum for additional details.

Discussion:

The City of Milwaukee, working with local partners, will allocate at least \$137,500 for activities geared to remove or ameliorate the negative effects and barriers to affordable housing.

The Analysis of Impediments to fair housing is a document that is required every 5 years from any Participating Jurisdiction that conforms to the Block Grant Consolidated Planning process and Public Housing Agencies (PHAs). The U.S. Department of Housing and Urban Development in the Final Rule for the Affirmatively Fair Housing Marketing Plan (AFHMP) stated best practices for submission of the plan. A regional planning process approach will assist communities analyze challenges to fair housing choice and establish goals and priorities to address the fair housing barriers.

Jurisdictions and Public Housing Authorities supporting the 2016 Milwaukee County AFHMP:

- City of Milwaukee
- Housing Authority City of Milwaukee
- Milwaukee County Housing Division
- Milwaukee County Housing Division (PHA)
- City of Wauwatosa
- City of West Allis
- West Allis Public Housing Authority
- South Milwaukee Housing Authority
- Waukesha County
- Waukesha County Housing Authority

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Milwaukee has implemented two major initiatives, the Strong Neighborhoods and Growing Prosperity Plans, to address issues of affordable housing, foreclosure, economic opportunities, quality of life, and neighborhood stability.

In 2014, Mayor Barrett and the Common Council established the Strong Neighborhoods Plan as the City's "all hands on deck" approach to vacancy and foreclosure. The Plan seeks to build on Milwaukee's success in stabilizing the housing market, and continue the city's recovery from the foreclosure crisis. Since 2014, the Mayor and Council have allocated over \$33 million for Strong Neighborhoods.

The plan has four strategic goals:

- PREVENT tax delinquency and tax foreclosure
- MITIGATE blight and ensure vacant properties do not deteriorate
- REVITALIZE neighborhoods through sales and rehab of tax foreclosed property
- RENEW Milwaukee neighborhoods by activating vacant space

Growing Prosperity is an Action Agenda for Economic Development in the City of Milwaukee addressing the need for actions to be taken in the city itself—by city government and by others— to capitalize on regional strategies for growth so that the city can thrive in an increasingly global economy.

Growing Prosperity outlines 10 principles and a broad vision, closely aligned with the goals of the M7 framework that will put the City of Milwaukee and its residents on a path to economic success.

This Action Agenda explores four areas of focus:

- <u>location-based</u> opportunities,
- <u>human capital</u> development,
- entrepreneurship and innovation, and
- quality of life and place

Both plans require partnerships with some of the many businesses, foundations, nonprofits, and other organizations that work in the City of Milwaukee.

Actions planned to address obstacles to meeting underserved needs

The Community Development Grants Grant Administration (CDGA) has defined a Housing and Community Development 5-Year Strategy which focuses on creating viable neighborhoods and providing decent and affordable housing and economic opportunity for all residents. This community vision

recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and access to community social services. The City will continue to encourage CDBG, HOME and other HUD-funded project recipients to include work experience opportunities in their housing rehab and new construction projects and to link their projects with other public and private human service, resident organizing and economic development initiatives. The City will utilize CDBG and HOME entitlement funds to accomplish the specific housing goals along with other leveraged resources. In addition, the City will continue to expand collaborations with lenders, businesses, developers, other governmental entities, community stakeholders and other development resources such as WHEDA and Community Development Financial Institutions (CDFIs) to expand available resources. The need to focus on neighborhoods as a whole as well as individual housing units is well supported by the data. Over the past several years, various City departments have worked in collaboration with citizens and community-based agencies on initiatives to strengthen neighborhoods. By involving citizens in code enforcement, graffiti abatement, crime prevention, neighborhood cleanups, lead abatement and housing development, such as the Fresh Start housing program, community cohesion is improved while the physical appearance and safety of neighborhoods is enhanced.

Actions planned to foster and maintain affordable housing

Develop, maintain and expand the supply of affordable, safe and decent housing that is accessible to income eligible persons; expand opportunities for low income citizens to access affordable housing; increase maintenance and improvement of existing units; assist in preserving existing housing units.

The City continued to promote and provide opportunities for low income citizens to access affordable housing. All of the programs listed hereafter in this section provide outcomes that are consistent with the goals articulated in the Consolidated Plan. The Plan indicated that efforts will be made to increase homeownership opportunities and to improve the condition of the City's rental housing stock with an emphasis on large family rental units.

Actions planned to reduce lead-based paint hazards

The Health Department will continue to work closely with other City Departments and community partners on efforts to increase awareness off the EPA Lead-Safe Rule and integrate lead-safe work practices into City housing projects. The City has utilized multiple HUD grants for focused treatment of addressing high risk window components where lead paint content and lead dust levels are extremely high, while the property owner addresses other lead hazards that may be present in the home. In addition, the Health Department provides comprehensive secondary interventions to lead poisoned children and their families and has successfully engaged in community and housing-based primary prevention to prevent lead exposure in areas disproportionately impacted by childhood lead poisoning.

The City's Health Department has developed a comprehensive and nationally recognized program which includes both secondary interventions (services to lead poisoned children and their families) and primary prevention activities (making high risk housing lead-safe before a child is poisoned).

2017 Annual Action Plan - Implementation Strategy

- *Assure compliance with the HUD Lead Safe Housing Rule and EPA Renovation Repair and Painting (RRP) rule by providing information, education and training to property owners.
- *Continue to produce lead safe housing units in the high risk target area of the City of Milwaukee utilizing all available funding; provide partial grant subsidies to assure the safe remediation of lead-based paint hazards for high risk window components for housing units.
- *Provide investigations and case management to lead-poisoned children and their families in Milwaukee.
- *Collaborate with other City agencies; Department of City Development (DCD) and Dept. of Neighborhood Services (DNS), with the goal of increasing lead safe housing that is safe and habitable for Milwaukee families.
- *Involve community organizations and members most affected by the problem in neighborhood based strategies.
- *Increase the awareness and importance for lead testing of children; minimum of 3 blood lead tests before the age of 3.
- *Diversify and increase funding to make homes lead-safe before a child is poisoned. The average cost of lead abatement per housing unit is \$4,000 when working with the property owner to assure no open building code violations and property taxes are current

Actions planned to reduce the number of poverty-level families

The City of Milwaukee's Anti-Poverty Strategy is focused on the expansion of opportunity in the areas of education, employment, economic development and housing. The City has increasingly targeted local and federal resources toward concerted efforts to create jobs and generate economic activity in specific areas of the City affected by years of financial disinvestment. At the same time, City departments are working collaboratively with the non profit sector to advance innovative poverty reduction programs.

2017 Actions Planned:

• Create livable wage jobs through aggressive economic development activities to help reduce the unemployment of Milwaukee residents.

- Assist with training individuals for jobs within emerging industries such as manufacturing, health care, retail/hospitality, information technology, business / financial Services, water, and green economy industries.
- Provide workforce-based training, education and mentoring to increase participants' workforce skills in industry-related certifications or licenses(such as lead abatement, OSHA, home construction and rehabilitation).
- Increase partnerships with other entities to offer supportive services to workers to promote job stability and retention, such as: job training, apprenticeships, education.
- Support programs that provide skilled trades and high-tech training and those with an apprenticeship component such as Youth Build and Milwaukee Builds which offer housing apprenticeships along with education and supportive services.
- Promote and market the identities of neighborhood retail districts and implement existing improvement plans.
- Assist small businesses and microenterprises with technical assistance and access to capital through business lending and revolving loan programs
- Support transitional jobs programs for released inmates and for offenders diverted from incarceration.
- Generate economic activity directly or "piggyback" employment and economic development activities on social service programs that teach self sufficiency and independence
- Support public transit expansion and other transportation options that connect Milwaukee residents to jobs in outlying areas.
- Support the *Driver's License and Employability Program* to assist low income residents in restoring driver's license privileges and to assist in employment opportunities.
- Expand affordable homeownership opportunities for residents; increase quality affordable rental housing.
- Support programs and initiatives which assist in removing barriers for low income persons such as walk-to-work programs, English proficiency programs and those that provide access to an array of wrap services such as: Health services, social services, education, lifeskills, employment and transportation.
- Pursue new revenue sources and improve efficiency in current programs to maintain existing service levels.
- Work with community partners to improve the physical appearance, social and economic vitality of Milwaukee neighborhoods and commercial districts.
- Promote programs that respond to the social issues facing youth such as: education, unemployment, teen pregnancy, truancy, crime and violence.

Actions planned to develop institutional structure

Many funded activities are under the direct control and funded by the Community Development Grants Administration. These activities are primarily funded by CDBG, HOME, HOPWA and ESG funds. Funded activities will be implemented by the responsible organization and monitored by the CDGA.

Annual Action Plan

Activities carried out by Non-City Organizations

The majority of social service, public service, income transfer, transportation and health services delivered in the City of Milwaukee are administered by non-City organizations. These vital services are an essential part of the comprehensive community development effort. There is no formal institutional structure to coordinate these disparate services with those delivered by City Departments. The organizations that carry out these services must do so in a manner that will satisfy their funding source. At present, the requirements of the funding source do not necessarily compliment the policies of the City and sometimes contradict the goals and objectives of city-supported activities. The City makes every effort to be involved with non-city organizations, including other non-profit enterprises and for profit businesses, but the City cannot force changes in these services nor can the City create an institutional structure to carry out the Consolidated Plan. The City will continue to work on collaborative efforts with other organizations and continue to communicate the goals and policies of the City.

Institutional Structure: Annual Action Plan Priorities:

- Place a high priority on Interdepartmental coordination including collaboration between the
 City Attorney's Office, the Mayor's Office, the Milwaukee Police Department, the Department
 of Neighborhood Services and the Department of City Development to reduce the negative
 impacts of nuisance/blighted and foreclosed properties through the Strong Neighborhoods Plan
 and the Community Prosecution Program.
- Continue collaborative neighborhood improvement programs involving City departments and community-based agencies such as the Community Prosecution Unit, Neighborhood Clean-ups, City-Wide Housing Coalition and the Health Department Lead Abatement/Prevention Program.
- Coordinate City databases with those of community and other governmental entities to allow citizens and community groups to access the City's database to complete housing condition surveys, obtain information on property ownership, tax delinquency, outstanding building code violations and past rehab activity, (www. Milwaukee.gov).
- Provide public access to data for the public and community-based agencies; technical assistance for community-based agencies in gathering and researching data, internet mapping and data analysis of CDGA-funded activities.
- Continue updates and improvements to CDGA's web site to include pertinent information for community-based agencies and the public.
- Continue to enter into collaborations and partnerships with non-City organizations for planning and program implementation purposes.
- Continue to advocate for additional resources for a coordinated approach to community development and planning to address poverty issues and community renewal initiatives.

Actions planned to enhance coordination between public and private housing and social service agencies

The City of Milwaukee is committed to the continued coordination of all community development initiatives. The City will continue to facilitate partnerships between City Departments and community-based organizations, State and County government, neighborhood residents, businesses, faith-based entities and others in the private sector to efficiently link resources and carry out joint planning and program activities. These linkages include the following City departments: Dept. of City Development, Dept. of Administration/ Community Development Grants Administration, Information and Technology Management Division(ITMD), City Health Department, Dept. of Neighborhood Services, Milwaukee Police Department, Milwaukee Fire Department, Housing Authority, Milwaukee Public Library, Redevelopment Authority, Department of Public Works, Common Council/City Clerk, Comptroller's Office and City Attorney. This spirit of cooperation is further supported by the City's cabinet form of government and is carried out on a daily basis through many channels of communication including meetings, phone conversations, e-mail, and other correspondence.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

| program year and that has not yet been reprogrammed | 0 |
|---|---|
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to | ı |
| address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not | t |
| been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 0 |
| | |
| | |
| Other CDBG Requirements | |
| Other CDBG Requirements 1. The amount of urgent need activities | 0 |
| The amount of urgent need activities | 0 |
| · | 0 |
| The amount of urgent need activities | 0 |
| The amount of urgent need activities The estimated percentage of CDBG funds that will be used for activities that benefit | 0 |
| The amount of urgent need activities The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, | 0 |

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Not Applicable.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City will primarily use Recapture Provisions for all its' homebuyer activity, except in cases where the Resale Provisions are required, or when the Presumption of Affordability is requested for a particular project in advance. Recapture and Resale Provisions are clearly defined in the contract between the City and all subrecipients. It is enforced with an active covenant that is secured by a mortgage at time of closing, to ensure affordability of units acquired with HOME funds.

Period of Affordability

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. How to calculate the amount of HOME assistance in each unit and therefore the applicable period of affordability varies depending on whether the unit is under resale or recapture provisions.

Period of Affordability Under Resale Provisions

Under resale, §92.254(a)(5(i) of the HOME rule states that the period of affordability is based on the *total* amount of HOME funds invested in the housing. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the *direct HOME subsidy* provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability. The following table outlines the required minimum affordability periods.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City will ensure that, when a homebuyer sells his/her property, during the affordability period: the property is sold to another low-income homebuyer who will use the property as their principal

residence; the original homebuyer receives a fair return on investment, and the property is sold at a price that is "affordable to a reasonable range of low-income buyers." If the City only provides HOME assistance to develop the unit and HOME funds are not used to lower the purchase price from fair market value to an affordable price, resale provisions must be used.

<u>Ensuring Long term Affordability:</u> If the housing is transferred during the period of affordability, it must be made available for purchase only to a buyer whose family qualifies as low-income, and will use the property as its principal residence.

Fair Return on Investment: The City's resale requirements will ensure that, if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment (including the original homebuyer's initial investment and certain capital improvements).

<u>Presumption of Affordability:</u> In certain neighborhoods, housing can be presumed to provide a fair return to an original homebuyer upon sale, to be available and affordable to a reasonable range of low-income homebuyers, and to serve as the primary residence of a low-income family during the period of affordability. In such cases, the City will not impose resale restrictions because the characteristics of the neighborhood make it probable that these requirements will be met without the imposition of the restrictions. Instead, §92.254(a)(5)(i)(B) of the HOME rule states that the City may identify certain neighborhoods with housing and income conditions that will:

- 1) Provide ongoing affordable home prices;
- 2) Ensure that the sales price of a home will provide a fair return to the original homebuyer, and
- 3) Provide a pool of income-eligible homebuyers from the residents of the neighborhood.

Recapture Provisions: The HOME recapture provisions permit the original homebuyer to sell the property to any willing buyer during the period of affordability while the City is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer. Recapture Method: In the event of a voluntary or involuntary transfer of the property during the applicable period of affordability, the City will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided in the form of a deferred payment 0% interest loan. The loan will be forgiven prorata over the period of affordability (i.e., generally 5 years), as long as the home remains the principal residence of the homebuyer. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the prorated amount of the HOME subsidy, The City shall recapture the balance due on the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not Applicable

Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Response: Families/Singles/Youth

Standard policies and procedures are being developed to ensure proper evaluation of families and individuals for assistance under ESG. Families will initially be evaluated using a standardized evaluation tool. The evaluation tool will be used by 211 or other homeless system point of entry to conduct a cursory assessment to determine demographics, income level, housing status and the determination of which agency will best provide assistance to the family or individual. All individuals that contact 211 will have this assessment completed and will be either directed to a shelter, community case manager, or homeless prevention provider. Once a family has been referred to a shelter, within one week the shelter will assess the family for Rapid Rehousing eligibility. Eligibility will be based on the uniform assessment tool that all agencies will utilize to ensure that each applicant is assessed properly. All individuals must either be homeless, at-risk of homelessness or at imminent risk of homelessness. All individuals involved must not have any other appropriate subsequent housing options identified. Also, individuals must lack the financial resources and support networks to remain in the existing home.

Individuals must also meet ESG income guidelines.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Milwaukee Continuum of Care established Coordinated Entry in October 2013 after a two-year planning process. Coordinated Entry is sponsored by United Way of Greater Milwaukee and operated by 211 at IMPACT. An ongoing work group functions in an advisory capacity to support implementation.

Coordinated Entry covers all of Milwaukee County. It is a one-call system operated by 211, accessible via phone call, text message, and online. Coordinated Entry is advertised through high-volume sites including churches, meal programs, community centers, and libraries as well as advertised via bus signs, billboards, TV, radio, newspapers, and social media.

Trained staff uses the Coordinated Entry Assessment Tool as a priority ranking method to determine callers in greatest need for emergency shelter and to facilitate referral of other callers to community services to support housing stability. The Assessment Tool gathers the following information: name, date of birth of all families members, English proficiency, special population (veterans, recently incarcerated, exiting transitional housing, domestic violence, disabling conditions such as substance abuse, mental illness, pregnancy, or other medical/physical disability, special accommodations required to obtain shelter, where stayed previous night, length of stay/ability to stay longer, monthly income, and consent for release of information. In addition, Coordinated Entry has access to HMIS to view callers' service history.

Persons determined to be in greatest need are warm-transferred to emergency shelter. Prevention and supportive services are arranged for those persons whose living situation can be extended pending a permanent housing placement. At this time, Coordinated Entry serves families and single women; expansion is planned to single men in 2014. The goal is for Coordinated Entry to include transitional housing, safe haven, rapid re-housing, and permanent supportive housing to warm transfer options using the VI-SPDAT (Vulnerability Index – Service Prioritization Decision Assistance Tool) to better inform needs and resource matching. Coordinated Entry is a major system improvement for the Continuum of Care that will result in more efficient utilization of homeless services and better outcomes for individuals and families.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

CDGA administers the ESG funds allocated directly to the City of Milwaukee as well as ESG funded awarded to Milwaukee by the State of Wisconsin. For directly allocated ESG, CDGA solicits the recommendations formulated collaboratively by the Shelter Provider Advisory Group, which is affiliated with the Continuum of Care, and the CoC Executive Board in making its ESG recipient selections and allocations. Those recommendations are ratified by the Milwaukee Common Council and the Mayor.For ESG funds awarded to Milwaukee by the State of Wisconsin, there is a local competitive process that begins with community notification of funding availability and invitation to apply. Selected projects are included in a consolidated application prepared by CDGA as Lead Agency for the Continuum of Care. The application is submitted to the Wisconsin Division of Housing. CDGA administers contracts with recipients/sub-recipients for both ESG allocations. ESG reporting and performance evaluation is conducted by means of Performance Activity Reports/ HMIS completed by each organization and submitted monthly to CDGA. ESG priorities are aligned with the CoC's 10-Year Plan, Consolidated Plan, and Housing and Service System Plan.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Continuum of Care regularly solicits input from homeless individuals and families via the semiannual Point in Time survey. Survey results are used to prioritize needs, develop program initiatives,
and evaluate progress over time. In addition, the CoC has several members who have the lived
experience of having been homeless, many are veterans who are active in one of the CoC's six
veterans services organizations. Guest House, an organization operating emergency shelter,
transitional housing, and permanent supportive housing, sponsors a group of former consumers
called Living Proof. This group meets regularly to advise Guest House on policies and programs and
to provide insight and advice to the Continuum of Care. On the community level, an increasing
number of persons with lived experience in the areas of mental illness and substance abuse as well
as having experienced periods of homelessness have become active in entities associated with the
Continuum of Care including the Milwaukee County Mental Health Redesign Task Force, MC3, and
the peer support specialist movement. Twenty peer support specialists with diverse lived experience
are currently employed by Milwaukee County-operated CoC-funded Permanent Supportive Housing
programs.

5. Describe performance standards for evaluating ESG.

As the Lead Agency of the Continuum of Care, CDGA has a signed MOU with each CoC/ESG program authorizing access of program documents to address program quality, expenditures, and compliance reporting. If needed, the Lead Agency can recommend participation in performance improvement including training and additional reporting. The MOU is enforced through review of each program's APR (Annual Performance Report) and data quality reviews conducted by the Continuum of Care HMIS (Homeless Management Information System) and shared with the Lead Agency. Annual performance reviews are conducted for renewal program rating and ranking. Monthly performance reports are required by CDGA of all funded groups in conformance with the new HUD Statutory Program Outcomes. The results provide a monthly performance scorecard. Funded agencies also submit semi-annual and year-end reports detailing accomplishments along with backup documentation. HUD performance goals are incorporated into all levels of compliance monitoring. The Lead Agency (CDGA) monitoring staff maintains extensive contact with funded agencies and provides technical assistance to ESG-funded groups when needed. Agencies needing additional technical assistance are referred to the Nonprofit Center of Milwaukee (NPC) which is under contract to CDGA to provide individual consultation to programs and provide a comprehensive calendar of nonprofit management training opportunities. When longer term technical assistance is required, CDGA provides ongoing guidance necessary to correct deficiencies and strengthen overall project capacity. A critical step in improving performance has been the implementation of a clear, objective performance measurement system (PMS) which allows projects to assess their progress relative to other Milwaukee projects and HUD performance goals. The PMS

also allows technical assistance to be specifically targeted to deficiencies and provides documentation necessary to administer funding sanctions in response to uncorrected poor performance. HUD technical assistance is available for longer term technical assistance project which involve a level of complexity that exceeds available CDGA and Nonprofit Center capacity. The City will continue to conduct formal and informal site reviews of CDGA-funded programs as well as perform risk assessments and in-house desk audits of those programs. CDGA will receive fiscal guidance from the City Comptroller's Office, the fiscal arm of CDGA, when reviewing those agencies' financial documents and expenditures. While at this point, CDGA's authority does not extend to this level of monitoring for all CoC grants, ESG-funded agencies have complied with monitoring by CDGA as part of its Lead Agency responsibilities. On-site monitoring, tracking of progress on performance goals, and reporting out to the Continuum of Care as a whole are major improvements for the Milwaukee CoC, instituted in 2012-13, which enable the identification of technical assistance needs and capacity-building initiatives for the future.

Housing Trust Fund (HTF) Reference 24 CFR 91.220(I)(5)

- 1. Distribution of Funds
- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).
- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.
- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.
- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.
- e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.
- f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

- g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.
- h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).
- i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.
- j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.
- 2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?
- 3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?
- 4. **Performance Goals and Benchmarks.** The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.
- 5. **Rehabilitation Standards.** The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

| 6. Resale or Recapture Guidelines. Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A". |
|--|
| 7. HTF Affordable Homeownership Limits. If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A". |
| 8. Limited Beneficiaries or Preferences. Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A." |
| Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan. |
| 9. Refinancing of Existing Debt. Enter or attach the jurisdiction's refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter "N/A." |
| Discussion: |